UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs*, v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs*, v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	Civil Action No. 23 CV 1104

***WILLIAMS* PLAINTIFFS' AMENDED PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's May 23, 2024 Notice of Hearing, ECF No. 50, *Williams* Plaintiffs respectfully submit the following Amended Pretrial Disclosures. *Williams* Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate. *Williams* Plaintiffs also reserve the right to supplement or modify these disclosures based on the Court's rulings on any outstanding issues.

I. WITNESSES

Williams Plaintiffs' Witness List is attached as **Exhibit A**. Because *Williams* Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial, they reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call their witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on another party's witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendants object; (4) reasonably supplement or amend this witness list through and including the time of trial to the extent agreed upon by the parties or permitted by the Court; (5) introduce deposition testimony as impeachment evidence; (6) change a witness from a live witness to a witness testifying by deposition, and vice versa; or (7) change a witness from a live witness to a witness testifying by declaration. *Williams* Plaintiffs reserve the right to supplement or modify this witness list in response to rulings made by the Court. *Williams* Plaintiffs' identification of any witness listed herein is not an admission that the testimony would be admissible if offered by Defendants.[1]

II. TRIAL EXHIBITS

[1] Pursuant to the Court's June 4, 2025 Order, the deadline to exchange deposition designations under Federal Rule of Civil Procedure 26(a)(3) for witnesses who become unavailable for trial has been modified to July 17, 2025, and the deadline for objections and counter-designations for deposition designations has been modified to July 22, 2025. ECF No. 135.

Williams Plaintiffs' Amended Trial Exhibit List is attached as **Exhibit B**. *Williams* Plaintiffs reserve the right to offer any exhibit identified by any other party in their Pretrial Disclosures and to introduce additional documents as rebuttal or impeachment evidence. *Williams* Plaintiffs also reserve the right to modify, amend, or supplement this exhibit list leading up to and through trial. *Williams* Plaintiffs' identification of any exhibits listed herein is not an admission that the exhibit would be admissible if offered by Defendants. *Williams* Plaintiffs may offer portions of listed exhibits at trial. *Williams* Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which the parties have agreed to exchange shortly before a corresponding witness testifies.

Dated: June 6, 2025

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

Exhibit A

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs*, v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs*, v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	Civil Action No. 23 CV 1104

***WILLIAMS* PLAINTIFFS' WITNESS LIST**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's May 23, 2024 Notice of Hearing, ECF No. 50, *Williams* Plaintiffs respectfully submit the following list of witnesses they expect to testify at trial.

Will-Call Witnesses	
1	Earl Jones – Plaintiff

2	Pamlyn Stubbs – Plaintiff
3	Chenita Johnson – Plaintiff
4	Allison Shari Allen – Plaintiff
5	Jonathan Rodden – Expert Witness
6	Max Palmer – Expert Witness
7	Chris Clark – Expert Witness
8	James L. Leloudis II – Expert Witness
9	Senator Ralph Hise – Adverse Witness
10	Blake Springhetti – Adverse Witness
May-Call Witnesses	
11	Shauna Williams – Plaintiff
12	Minerva Freeman – Plaintiff
13	Armenta Eaton – Plaintiff
14	James Adams – Plaintiff
15	Laura McClettie – Plaintiff
16	Virginia Keogh – Plaintiff

Exhibit B

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs*, v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs*, v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	Civil Action No. 23 CV 1104

***WILLIAMS* PLAINTIFFS' AMENDED EXHIBIT LIST**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's notice, ECF No. 50, *Williams* Plaintiffs respectfully submit the following list of exhibits they may offer as substantive evidence at trial.[1]

[1] In accordance with the Court's May 15, 2025 Order, ECF No. 115, *Williams* Plaintiffs have conferred with all parties on a Joint Exhibit List and file this Amended Exhibit List, removing exhibits that are instead listed on the Joint Exhibit List. To minimize duplication for the Court, *Williams* Plaintiffs have also removed several exhibits that appear on *NAACP* Plaintiffs' exhibit list.

Exhibit Number	Exhibit Description	Document Identification	Admitted
	Expert Reports[2]		
WX1	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024)		
WX2	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024)		
WX3	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025)		
WX4	Expert Report of Maxwell Palmer, Ph.D. (Aug. 1, 2024)		
WX5	Reply Report of Maxwell Palmer, Ph.D. (Oct. 17, 2024)		
WX6	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025)		
WX7	Supplemental Rebuttal Report of Maxwell Palmer, Ph.D. (March 31, 2025)		
WX8	Expert Report of Dr. Chris Clark (Corrected) (Aug. 1, 2024)		
WX9	CV of Dr. Chris Clark		
WX10	Expert Reply Report of Dr. Chris Clark (Oct. 17, 2024)		
WX11	Supplemental Expert Report of Dr. Chris Clark (March 17, 2025)		
WX12	Supplemental Rebuttal Expert Report of Dr. Chris Clark (March 31, 2025)		
WX13	Expert Report of Dr. James L. Leloudis II (Aug. 1, 2024)		
WX14	Duplicate of NAACPPX180		
WX15	Duplicate of NAACPPX199		
WX16	Duplicate of NAACPPX205		
WX17	Duplicate of NAACPPX195		
WX18	Duplicate of NAACPPX196		
WX19	Duplicate of NAACPPX204		
WX20	Duplicate of NAACPPX212		
	Expert Report Figures		
WX21	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 2: Dot Density Map of Black Population and 2022 and 2023 Congressional Plans		

[2] Expert reports include all exhibits and appendices attached to each respective report.

WX22	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 4: Dot Density Map of Race in the Piedmont Triad Region		
WX23	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 5: Piedmont Triad Major City Boundaries and 2023 District Boundaries		
WX24	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 6: Dot Density Map of Race in the Charlotte Area		
WX25	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 7: Charlotte City Boundary and 2023 Congressional District Boundaries		
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		
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		
WX28	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2022 Congressional Plans		
WX29	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2023 Congressional Plans		
WX30	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 1: Reproduction of Dr. Trende's Choropleth Map of the Piedmont Triad		
WX31	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 2: Reproduction of Dr. Trende's Choropleth Map of the Charlotte Area		
WX32	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 3: The Distribution of Black Voting-Age Population in Simulated Plans		
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		
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		

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		
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		
WX37	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 11: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Maps from October		
WX38	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_1, Appendix 2		
WX39	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_5, Appendix 2		
WX40	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBK_2, Appendix 2		
WX41	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBA_2, Appendix 2		
WX42	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CDS 003 and CDS 005, Appendix 2		
WX43	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CMT_1 and CMT_2, Appendix 2		
WX44	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCH_4 and CMT_2, Appendix 2		
WX45	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCJ_1 and CCH_4, Appendix 2		
WX46	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and CCJ_1, Appendix 2		
WX47	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and Enacted, Appendix 2		
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)		
WX49	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 2: The Enacted Plan in the Piedmont Triad		
WX50	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 3: Alternative Plan "CMT-1" in the Piedmont Triad		

WX51	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 4: Alternative Plan "Springhetti 3" in the Piedmont Triad		
WX52	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 5: Alternative Plan "Springhetti 3, v2" in the Piedmont Triad		
WX53	Expert Report of Dr. Maxwell Palmer (Aug. 1, 2024), Figure 3: Racially Polarized Voting Estimates by Region		
WX54	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025), Figure 2: Racially Polarized Voting Estimates by Region		
Plaintiff Standing Declarations			
WX55	1/3/25 Declaration of Alan Rene Oliva Chapela		
WX56	1/3/25 Declaration of Allison Shari Allen		
WX57	1/3/25 Declaration of Flor Herrera-Picasso		
WX58	1/3/25 Declaration of German De Castro		
WX59	1/3/25 Declaration of James Adams		
WX60	1/3/25 Declaration of Laura McClettie		
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		
WX65	1/3/25 Declaration of Virginia Keogh		
WX66	5/13/25 Declaration of Minerva Freeman		
WX67	5/13/25 Declaration of Maura Aceto		
WX68	5/29/25 Declaration of Javier Limon		
WX69	5/13/25 Declaration of Armenta Eaton		
WX70	5/13/25 Declaration of Chenita Johnson		
WX71	5/13/25 Declaration of Pamlyn Stubbs		
WX72	5/13/25 Declaration of Earl Jones		
Legislative Redistricting – Hearing Transcripts			
WX73	Moved to JX001	LD0000001—LD00000053	
WX74	Moved to JX002	LD0000683—LD0000783	

WX75	Moved to JX003	LD0000784—LD0000827	
WX76	Moved to JX004	LD0001826—LD0001899	
WX77	Moved to JX005	LD0000124—LD0000165	
WX78	Moved to JX008	LD0003172—LD0003200	
WX79	Moved to JX010	LD0000373—LD0000396	
WX80	Moved to JX007	LD0001723—LD0001825	
Legislative Redistricting – Public Comment Hearings and Portal Comments			
WX81	Moved to JX066	Hise Ex. 12	
WX82	Moved to JX067	LD0004748—LD0004749	
WX83	Moved to JX068	Hise Ex. 12	
WX84	Moved to JX069	LD0004745—LD0004746	
WX85	Moved to JX070	Hise Ex. 12	
WX86	Moved to JX071	LD0004756—LD0004757	
WX87	Moved to JX060	LD0000397—LD0000435	
WX88	Moved to JX059	LD0000436—LD0000538	
WX89	Moved to JX058	LD0000539—LD0000682	
WX90	Duplicate of NAACPPX79	LD0000939—LD0000946	
WX91	Duplicate of NAACPPX77	LD0000828—LD0000848	
WX92	Duplicate of NAACPPX76	LD0000849—LD0000874	

WX93	10/19/23 Public Comment Report	LD0000875—LD0000882	
WX94	10/23/23 Public Comment Report	LD0000883—LD0000895	
WX95	10/24/23 Public Comment Report	LD0000896—LD0000907	
WX96	10/25/23 Public Comment Report	LD0000908—LD0000938	
Legislative Redistricting – Additional Materials			
WX97	Duplicate of NAACPPX101	LD0001717—LD0001719	
WX98	Moved to JX046	LD0002197—LD0002201	
WX99	9/28/23 Common Cause Emails Regarding 2023 Redistricting Process	LD0009230—LD0009236	
WX100	9/29/23 Progress NC Action Email	LD0002538—LD0002540	
WX101	10/3/23 Redistricting Criteria Letter (Cover Email)	LD0001489—LD0001491	
WX102	10/3/23 Redistricting Criteria Letter	LD0001492—LD0001495	
WX103	10/5/23 SCSJ Press Release	LD0002298—LD0002299	
WX104	10/12/23 Notice to Preserve Records of Redistricting in Anticipation of Litigation	LD0004127—LD0004128	
WX105	Moved to JX053	LD0003777	
WX106	Duplicate of NAACPPX47	LD0002305—LD0002306	
WX107	Duplicate of NAACPPX47	LD0002339—LD0002343	
WX108	Duplicate of NAACPPX189	LD0002319—LD0002338	
WX109	Moved to JX109	LD0004145; Barber Suppl. Ex. 7	

WX110	Moved to JX110	LD0004478; Springhetti Ex. 6	
WX111	Moved to JX258		
WX112	Moved to JX259		
WX113	Moved to JX257, JX260, and JX264	Hise Ex. 15	
WX114	Moved to JX224	Hise Ex. 20	
Deposition Exhibits			
WX115	Duplicate of NAACPPX266	Hise Ex. 1	
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	
WX117	Expert Report of Dr. Jeffrey B. Lewis in *North Carolina League of Conservation Voters v. Hall*, No. 21-CVS-015426	Hise Ex. 23	
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	
WX119	Duplicate of NAACPPX89	Hise Ex. 26, LD0001607	
WX120	Duplicate of NAACPPX21	Hise Ex. 48, LD0002612	
WX121	Duplicate of NAACPPX48	Hise Ex. 49, LD0002279	
WX122	Duplicate of NAACPPX340	Hise Ex. 54	
WX123	Dot density map comparing 2022 and 2024 Congressional boundaries in Mecklenburg	Hise Ex. 58	
WX124	Dot density map comparing 2022 and 2024 Congressional boundaries in Piedmont Triad	Hise Ex. 57	
WX125	Fred Backus, Anthony Salvanto, Big Majorities Reject Book Bans – CBS News Poll, CBS News (Feb. 22, 2022)	Taylor Ex. 4	
WX126	Michael J. Pomante II, *Cost of Voting in the American States: 2024*, ELECTION LAW JOURNAL: RULES, POLITICS, AND POLICY	Taylor Ex. 6	
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	
WX128	*Cheri Beasley's Senate Campaign Latest to Take on Race, Gender Barriers*, Charlotte Post	Hood Ex. 3	

WX129	Danielle Battaglia, *NC TV Stations Pull Ad Attacking Senate Candidate Beasley Over Its "False Statements*," News & Observer (Oct. 25, 2022)	Hood Ex. 4	
WX130	Will Wright, *Group Targets Beasley with TV Ad About Sex Offender Case*, Charlotte Observer (Oct. 4, 2022)	Hood Ex. 5	
WX131	Michael Barber and Kosuke Imai, Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records	Barber Ex. 4	
WX132	Moved to JX355	Alford Suppl. Ex. 4	
WX133	Moved to JX044	LD0004475, Springhetti Ex. 4	
Discovery Responses			
WX134	Legislative Defendants' Objections and Responses to *Williams* Plaintiffs' First Set of Interrogatories (May 24, 2024)		
WX135	Legislative Defendants' Objections and Responses to *NAACP* Plaintiffs' First Set of Interrogatories (May 24, 2024)		
WX136	Responses to Plaintiffs' First Set of Interrogatories to State Board Defendants (June 19, 2024)		
WX137	Legislative Defendants' First Amended Privilege Log	Springhetti Ex. 3	
WX138	Legislative Defendants' Third-Party Search Privilege Log		
Maps			
WX139	Moved to JX218	Springhetti Ex. 16	
WX140	Moved to JX149		
WX141	Moved to JX072		
WX142	Moved to JX102		
WX143	Moved to JX073		
WX144	Moved to JX074		
WX145	Moved to JX075 and JX078		
WX146	Moved to JX081		
WX147	Moved to JX120, JX122, JX126, JX127, JX133–35, JX138–42, JX148, JX153-154, JX157, JX159–61, JX164–165, JX168	LD_MAP_000001-002610	

WX148	Moved to JX151	LD_MAP_001613, Hise Ex. 33	
WX149	Moved to JX152	LD_MAP_002609, Hise Ex. 35	
WX150	Moved to JX144–45	LD_MAP_002334, Hise Ex. 38	
WX151	Moved to JX124	LD_MAP_001799, Hise Ex. 42	
WX152	Moved to JX076	Hise Ex. 52	
WX153	Moved to JX077	Hise Ex. 53	
WX154	Draft map, CMT-1		
WX155	Draft map, CMT-2		
WX156	Draft map, CBA-2		
WX157	Draft map, CBK-2		
WX158	Draft map, CBP-1		
WX159	Draft map, CBP-5		
WX160	Draft map, CCH-4		
WX161	Draft map, CCJ-1		
WX162	Draft map, CCL-1	Springhetti Ex. 19	
WX163	Withdrawn as duplicate		
WX164	Withdrawn as duplicate		
WX165	Draft map, CST-3		
WX166	Springhetti draft map, CDs 003	Springhetti Ex. 15	
WX167	Springhetti draft map, CDs 003 v2	Springhetti Ex. 17	
WX168	Springhetti draft map, CDs 005	Springhetti Ex. 18	
Other Bills			
WX169	Moved to JX362		

WX170	Conference Committee Substitute of H.B. 259, https://webservices.ncleg.gov/ViewBillDocument/2023/7268/0/H259-PCCS50044-MHXR-6.		
WX171	Duplicate of NAACPPX107		
WX172	Enacted H.B. 259 (N.C. Oct. 3, 2023), https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v7.pdf		
	Additional Exhibits		
WX173	North Carolina's Population: Short-term Challenges, Long-term Growth Factors, *North Carolina Office of State Budget and Management* (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/.		
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.		
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.		
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.		
WX178	Annette Fuller, *Flier Opens an Old Wound*, WINSTON-SALEM JOURNAL (Oct. 21, 2010), https://journalnow.com/news/local/flier-opens-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.		
WX180	Video: "Good Person" CFG Action Ad (NC-SEN), https://www.youtube.com/watch?v=gipaxcSHoaA&ab_channel=ClubforGrowth.		
WX181	Video: Ted Budd For Senate, "Crush the Broken Biden Beasley Agenda," https://www.youtube.com/watch?v=K4IbK9wTgjk.		
WX182	Video: Ted Budd for Senate, "The Checkered Flag is in Sight," https://www.youtube.com/watch?v=IMbu7nTMYjQ.		
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/.		
WX184	Moved to JX356		
WX185	Moved to JX361		
WX186	M.V. Hood III, Seth Mckee, *True Colors: White Conservative Support for Minority Republican Candidates*, PUBLIC OPINION QUARTERLY (Feb. 2015)		
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)		
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)		
WX189	M.V. Hood III and Seth C. McKee, *Rural Republican Realignment in the Modern South*		