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

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

# FIRST AMENDED JOINT STIPULATED FACTS

***2023 redistricting process***

1. The co-Chairs of the Senate Redistricting and Elections Committee from January 2023 to December 2024 were Senator Ralph Hise, Senator Warren Daniel, and Senator Paul Newton (hereafter the "Senate Redistricting Chairs").

2. The Chair of the House Redistricting Committee from January 2023 to December 2024, was then-Representative Destin Hall.

3. On or about April 28, 2023, the co-Chairs of the Senate Redistricting and Elections Committee understood that they would need to finalize any draft maps by mid-October 2023 to meet the State Board of Elections' deadlines for the primaries the following year.

4. On April 28, 2023, following the North Carolina Supreme Court's decision in *Harper v. Hall*, 384 N.C. 2 (*Harper III*), then-House Speaker Tim Moore issued the following statement regarding redistricting: "We will fulfill our constitutional duty to redraw state house, senate and congressional maps." NAACPPX101.

5. The Senate Redistricting Chairs began developing criteria to draw new Senate and Congressional plans in the summer of 2023.

6. In August 2023, Speaker Hall retained Blake Springhetti to draw draft House and Congressional plans and provided him criteria titled "Guidance of Drawing State House and Congressional Districts." JX039, 044.

7. The Senate Redistricting Chairs decided not to engage a third-party mapdrawer to develop draft Senate and Congressional plans, and instead drew the plans themselves with the technical support of partisan and non-partisan staff.

8. The General Assembly passed H.B. 259, the 2023 Appropriations Act, on September 22, 2023, which was enacted into law on October 3, 2023, after it failed to receive the Governor's signature.

9. On September 18, 2023, the Senate Committee on Redistricting and Elections noticed three public meetings:

a. A meeting at the College of Albemarle in Elizabeth City on Monday, September 25, 2023, at 4 PM, *see* JX066;

b. A meeting at the Hickory Campus of Appalachian State University on Tuesday, September 26, 2023, at 4 PM, *see* JX068;

c. A meeting at the Legislative Office Building in Raleigh on Wednesday, September 27, 2023, at 4 PM. *See* JX070.

10. The time, location, and number of these meetings were agreed upon by the Senate Redistricting Chairs in coordination with House Redistricting Committee Chair Hall.

11. On or about September 23, 2023, the North Carolina General Assembly also posted a public comment portal for redistricting. JX065.

12. On September 25, 2023, a group of more than 50 public interest organizations issued a public letter to the co-Chairs of the Senate Standing Committee on Redistricting and Elections, Chair of the House Standing Committee on Redistricting, and legislative leadership regarding the public redistricting process. JX046.

13. The transcript for the Elizabeth City September 25, 2023, public meeting is in JX060.

14. The transcript for the Hickory September 26, 2023, public meeting is in JX059.

15. The transcript for the Raleigh September 27, 2023, public meeting is in JX058.

***2023 Enacted Maps***

16. On October 18, 2023, Senators Hise, Daniel, and P. Newton filed as primary sponsors Senate Bill 758 (S.B. 758) titled "Realign NC Senate Districts 2023/SCJ-1." *See* JX099.

17. On October 18, 2023, Senators Hise, Daniel, and P. Newton filed as primary sponsors Senate Bill 756 (S.B. 756) titled "Congressional Districts 2023/CBP-5." *See* JX100.

18. On October 18, 2023, Senators Hise, Daniel, and P. Newton filed as primary sponsors Senate Bill 757 (S.B. 757) titled "Realign Congressional Districts 2023/CCJ-1." *See* JX106; JX107.

19. On October 18, 2023, the Senate Committee on Redistricting and Elections noticed a meeting for October 19, 2023 at 2:00 PM to discuss S.B. 756, S.B. 757, and S.B. 758. *See* JX048.

20. On October 18, 2023, the Senate Committee on Redistricting and Elections posted publicly on the General Assembly's website the following materials:

a. A district map, Statpack report, and data file of S.B. 758. JX109 (SCJ-1 district map); JX119 (SCJ-1 Stat Pack); JX111 (SCJ-1 block assignment file)

b. A district map, Statpack report, and data file of S.B. 756. JX116 (CBP-5 district map); JX101 (CBP-5 Stat Pack); JX117 (CBP-5 block assignment file)

c. A district map, Statpack report, and data file of S.B. 757. JX107 (CCJ-1 filed district map); JX125 (CCJ-1 Stat Pack); JX108 (CCJ-1 block assignment file)

21. After the release of S.B. 758, S.B. 756, and S.B. 756, Statpacks with racial information were released at the direction of the Senate Redistricting Chairs. *See* JX002 at 5:24-6:9; JX388 (SCJ-1 StatPack with Race); JX102 (CBP-5 StatPack with Race); JX387 (CCJ-1 StatPack with Race).

22. On October 18, 2023, Speaker Hall filed as a primary sponsor House Bill 898 (H.B. 898) titled "House Redistricting Plan 2023/HST-2". JX112.

23. On October 18, 2023, the House Committee on Redistricting noticed a meeting for October 19, 2023, at 11:00 AM.

24. On October 18, 2023, the House Committee on Redistricting posted publicly on the General Assembly's website a district map of HST-2, Statpack report, and data file. JX113 (HST-2 district map); JX114 (HST-2 StatPack); JX115 (HST-2 block assignment file).

25. On October 19, 2023, the House Redistricting Committee met to debate H.B. 898 / HST-2.

a. JX001 is a true and accurate transcript of that meeting.

26. On October 19, 2023, the Senate Redistricting and Elections Committee met to debate S.B. 757 and S.B. 758.

a. JX002 is a true and accurate transcript of that meeting.

b. During that meeting, Members of the Senate Committee on Redistricting and Elections were provided the criteria used in drafting the maps related to S.B. 756, S.B. 757, and S.B. 758. JX002 at 3:10-16.

27. On October 22, 2023, the Co-Chairs and members of the Senate Redistricting and Elections Committee and then-Chair Hall and Members of the House Redistricting Committee received a letter from the Southern Coalition for Social Justice. NAACPPX047.

28. On October 23, 2023, the House Redistricting Committee met to debate H.B. 898/HST-2.

a. JX013 is a true and accurate transcript of that meeting.

b. An amendment offered by Representative Hawkins to districts in Chatham and Randolph counties was approved by the Committee. JX197 (HST-5 district map).

c. Two amendments offered by Representative Carney to alter district numbers, but not configurations, were approved by the Committee. JX198 (HCC-3 district map); JX199 (HCC-4 district map).

d. An amendment offered by Representative Reives to districts in Wake County was approved by the Committee. JX200 (HCH-8 district map).

e. An amendment offered by Representative Hawkins to districts in Cumberland County was approved by the Committee. JX196 (HBA-1 district map).

29. On October 23, 2023, the Senate Redistricting and Elections Committee met to debate S.B. 757 and S.B. 758.

a. JX003 is a true and accurate transcript of that meeting.

b. The Committee approved an amendment "CST-3" related to military bases affecting Onslow, Cumberland, Sampson, and Robeson counties in Congressional Districts 3, 7, and 8. JX215 (CST-3 Amendment); JX120 (CST-3 district map); JX121 (CST-3 Statpack); JX179 (CST-3 block assignment file).

c. The Committee reported favorably on the Committee Substitute for S.B. 757, PCS45380-BK-42, which is identical to the 2023 Congressional Plan. JX104 (CST-4).

d. The Committee approved two amendments to S.B. 758 altering Senate Districts in Durham and Guilford Counties offered by Senators Mayfield and Garrett respectively. JX205 (SCJ-2 district map); JX206 (SCM-1 district map)

e. The Committee reported favorably on the Committee Substitute for S.B. 758, PCS45382-ST-57, which is identical to the 2023 Senate Plan. JX103.

30. On October 24, 2023, the Senate met to debate S.B. 757 and S.B. 758.

a. JX004 is a true and accurate transcript of that meeting.

b. Senator Chaudhuri offered an Amendment to S.B. 757 that sought to preserve the 2022 Plan. JX085. The Amendment was tabled, and S.B. 757 passed its Second and Third readings in the Senate.

c. An Amendment offered by Senator Mohammed and two Amendments offered by Senator Blue to S.B. 758 were all tabled. JX086; JX087; JX088. S.B. 758 passed its Second and Third Readings in the Senate.

31. On October 24, 2023, the House Redistricting Committee met to debate S.B. 757. A majority voted for a favorable report.

a. JX005 is a true and accurate transcript of that meeting.

32. On October 24, 2023, the House of Representatives met to debate H.B. 898.

a. JX006 is a true and accurate transcript of that meeting.

b. An Amendment "A2" (HCM-6 Amend2) offered by Representative Reives to districts in Wake County passed. JX091; JX092.

c. An Amendment "A3" (HBA-5 Amend) offered by Representative Stevens to districts in Buncombe County passed. JX094; JX093.

d. An Amendment "A1" (HBA-3 Amend) offered by Representative Harrison to districts statewide failed. JX089; JX090.

e. An Amendment "A5" (HCM-5 Amend) offered by Representative Harrison to districts statewide failed. JX097; JX098.

33. On October 25, 2023, the Senate Redistricting and Elections Committee met to debate H.B. 898. And a majority voted for a favorable report on that bill.

a. JX010 is a true and accurate transcript of that meeting.

34. On October 25, 2023, the Senate met to debate H.B. 898, and that bill passed its Second and Third Readings in the Senate and was ratified into law as S.L. 2023-149.

a. JX011 is a true and accurate transcript of that meeting.

35. On October 25, 2023, the House Redistricting Committee met to debate S.B. S.B. 758. And a majority voted for a favorable report on both bills

a. JX012 is a true and accurate transcript of that meeting.

36. On October 25, 2023, the House of Representatives met to debate S.B. 757 and S.B. 758.

a. JX007 is a true and accurate transcript of that meeting.

b. An Amendment to S.B. 757 offered by Representative Quick failed and S.B. 757 passed its Second and Third Readings in the House of Representatives and was ratified into law as S.L. 2023-145.

c. S.B. 758 passed its Second and Third Readings in the House of Representatives and was ratified into law as S.L. 2023-146

***2021 Redistricting Process***

37. Following the 2020 Census, due to an increase in the State's population, North Carolina was apportioned 14 congressional districts, an increase of one district from the apportionment following the 2010 Census.

38. During the 2021 redistricting cycle, data from the 2020 Census was delayed due to the COVID-19 pandemic and was ultimately released on August 12, 2021.

39. On August 5, 2021, the General Assembly's Senate Redistricting and Elections Committee and the House Redistricting Committee convened a Joint Meeting to begin the discussion on the redistricting process. *Harper I*, 2022-NCSC-17, ¶ 14; JX244; JX245.

40. On August 9, 2021, the chairs of the Joint Redistricting Committee released its "2021 Joint Redistricting Committee Proposed Criteria" for public comment and committee debate. *Harper I*, 2022-NCSC-17, ¶ 14; NAACPPX251.

41. On August 10, 2021, the Joint Committee held a public meeting to receive public comment on the proposed redistricting criteria.

42. On August 12, 2021, the Joint Committee adopted the final redistricting criteria following amendments. JX224; NAACPPX248; NAACPPX249; NAACPPX250. The Joint Committee also debated a public hearing schedule. JX242.

43. In September 2021, the Joint Committee held thirteen public hearings across ten counties around the state. JX241.

44. Several hearings allowed virtual testimony and were held outside of business hours.

45. On October 5, 2021, the House and Senate redistricting committees convened separately to begin the redistricting process.

46. Proposed versions of the congressional and House maps were filed on October 28 and 29, 2021. A proposed version of the Senate map was filed on October 29, 2021.

47. Four additional public comment sessions were held after maps were released: two in person in Raleigh, and two online via Webex. JX238 (10/25 In-person); JX237 (10/25 Virtual); JX236 (10/26 In-person); JX235 (10/26 Virtual).

48. A public comment portal was also made available on the General Assembly's website.

49. Policies regarding public access to mapdrawing software, public comments, and legislator-drawn maps were also shared by the General Assembly. *See* JX239.

50. The 2021 State House plan was filed on October 28, 2021, and state Senate and federal Congressional plans were filed the next day.

51. All three plans were passed on November 4, 2021. *Harper I*, ¶ 18; JX228; JX229; JX230. The North Carolina Supreme Court subsequently struck down all three 2021 plans as unlawful partisan gerrymanders on February 4, 2022, with the Court issuing its opinion on February 14, 2022. *See Harper v. Hall*, 868 S.E.2d 499 (N.C. 2022) (*Harper I*), *aff'd sub nom*. *Moore v. Harper*, 600 U.S. 1 (2023). The North Carolina Supreme Court's February 4, 2022, order gave the General Assembly until February 18, 2022, to enact remedial plans and to submit those plans to the Wake County Superior Court for review. *Harper,* Feb. 4, 2022 Order at ¶¶ 6, 8-9.

52. The General Assembly submitted proposed remedial plans for the state house, state senate, and congress to the Wake County Superior Court. On February 23, 2022, that court issued an order approving the state house and state senate remedial plans, but rejecting the remedial congressional. *See Harper v. Hall,* 2022-NCSC-17, ¶ 166; *Harper,* Feb. 23, 2022 Order at ¶ 34.

53. The 2022 congressional elections were conducted under a court-ordered map. The 2022 legislative elections were conducted under remedial plans passed by the General Assembly.

54. In December 2022, the North Carolina Supreme Court decided *Harper v. Hall*, 881 S.E.2d 156 (N.C. 2022) (*Harper II*). *Harper II* affirmed the Wake County Superior Court's holding against the remedial congressional plan and its holding approving the remedial state house plan, but reversed that court's holding approving the state senate plan.

55. The General Assembly petitioned for a rehearing of *Harper*, which was granted. The North Carolina Supreme Court vacated the court-ordered map and allowed the General Assembly to draw new congressional, House, and Senate maps. *See Harper v. Hall*, 886 S.E.2d 393 (N.C. 2023) (*Harper III*).

***Williams* Plaintiffs**

56. Plaintiff Shauna Williams is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Warrenton in Warren County. Ms. Williams's residence was located in Congressional District 1 under the 2022 Congressional Plan and is also in Congressional District 1 under the 2023 Congressional Plan. WX64 (1/3/25 Declaration of Shauna Williams).

57. Plaintiff Flor Herrera-Picasso is a Latina Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Wilson in Wilson County. Ms. Herrera-Picasso's residence was located in Congressional District 1 under the 2022

Congressional Plan and is also in Congressional District 1 under the 2023 Congressional Plan. WX57 (1/3/25 Declaration of Flor Herrera-Picasso).

58. Plaintiff Minerva Freeman is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Fountain in Pitt County. Ms. Freeman's residence was located in Congressional District 1 under the 2022 Congressional Plan and is newly located in Congressional District 3 under the 2023 Congressional Plan. WX66 (5/13/25 Declaration of Minerva Freeman).

59. Plaintiff Maura Aceto is a Latina Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Greenville in Pitt County. Ms. Aceto's residence was located in Congressional District 1 under the 2022 Congressional Plan and is newly located in Congressional District 3 under the 2023 Congressional Plan. WX67 (5/13/25 Declaration of Maura Aceto).

60. Plaintiff Javier Limon is a Latino Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Winterville in Pitt County. Mr. Limon's residence was located in Congressional District 1 under the 2022 Congressional Plan and is newly located in Congressional District 3 under the 2023 Congressional Plan. WX68 (5/29/25 Declaration of Javier Limon).

61. Plaintiff Armenta Eaton is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Louisburg in Franklin County. Ms. Eaton's residence was located in Congressional District 1 under the 2022 Congressional Plan and is newly located in Congressional District 13 under the 2023 Congressional Plan. WX69 (5/13/25 Declaration of Armenta Eaton).

62. Plaintiff James Adams is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of High Point in Guilford County. Mr. Adams's residence was located in Congressional District 6 under the 2022 Congressional Plan and is also in Congressional District 6 under the 2023 Congressional Plan. WX59 (1/3/25 Declaration of James Adams).

63. Plaintiff Luciano Gonzalez-Vega is a Latinx Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Greensboro in Guilford County. Mx. Gonzalez-Vega's residence was located in Congressional District 6 under the 2022 Congressional Plan and is also in Congressional District 6 under the 2023 Congressional Plan. WX61 (1/3/25 Declaration of Luciano Gonzalez-Vega).

64. Plaintiff Chenita Johnson is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Winston-Salem in Forsyth County. Ms. Johnson's residence was located in Congressional District 6 under the 2022 Congressional Plan and is newly located in Congressional District 10 under the 2023 Congressional Plan. WX70 (5/13/25 Declaration of Chenita Johnson).

65. Plaintiff Pamlyn Stubbs is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Greensboro in Guilford County. Ms. Stubbs's residence was located in Congressional District 6 under the 2022 Congressional Plan and is newly located in Congressional District 5 under the 2023 Congressional Plan. WX71 (5/13/25 Declaration of Pamlyn Stubbs).

66. Plaintiff Earl Jones is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Greensboro in Guilford County. Mr.

Jones's residence was located in Congressional District 6 under the 2022 Congressional Plan and is newly located in Congressional District 5 under the 2023 Congressional Plan. WX72 (5/13/25 Declaration of Earl Jones).

67. Plaintiff Allison Shari Allen is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Charlotte in Mecklenburg County. Ms. Allen's residence was located in Congressional District 14 under the 2022 Congressional Plan and is newly located in Congressional District 12 under the 2023 Congressional Plan. WX56 (1/3/25 Declaration of Allison Shari Allen).

68. Plaintiff Laura McClettie is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Charlotte in Mecklenburg County. Ms. McClettie's residence was located in Congressional District 14 under the 2022 Congressional Plan and is newly located in Congressional District 12 under the 2023 Congressional Plan. WX60 (1/3/25 Declaration of Laura McClettie).

69. Plaintiff Nelda Leon is a Latina Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Charlotte in Mecklenburg County. Ms. Leon's residence was located in Congressional District 14 under the 2022 Congressional Plan and is newly located in Congressional District 12 under the 2023 Congressional Plan. WX63 (1/3/25 Declaration of Nelda Leon).

70. Plaintiff German De Castro is a Latino Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Charlotte in Mecklenburg County. Mr. De Castro's residence was located in Congressional District 14 under the 2022

Congressional Plan and is newly located in Congressional District 12 under the 2023 Congressional Plan. WX58 (1/3/25 Declaration of German De Castro).

71. Plaintiff Alan Rene Oliva Chapela is a Latino Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Gastonia in Gaston County. Mr. Oliva Chapela's residence was located in Congressional District 14 under the 2022 Congressional Plan and is also in Congressional District 14 under the 2023 Congressional Plan. WX55 (1/3/25 Declaration of Alan Rene Oliva Chapela).

72. Plaintiff Virginia Keogh is a Black Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Charlotte in Mecklenburg County. Ms. Keogh's residence was located in Congressional District 14 under the 2022 Congressional Plan and is also in Congressional District 14 under the 2023 Congressional Plan. WX65 (1/3/25 Declaration of Virginia Keogh).

73. Plaintiff Natalee Nanette Nieves is a Latina Citizen of the United States and of the State of North Carolina, a registered voter, and a resident of Gastonia in Gaston County. Ms. Nieves's residence was located in Congressional District 14 under the 2022 Congressional Plan and is also in Congressional District 14 under the 2023 Congressional Plan. WX62 (1/3/25 Declaration of Natalee Nanette Nieves).

***NAACP* Plaintiffs**

74. Plaintiff North Carolina State Conference of the NAACP ("North Carolina NAACP") is federally-registered 501(c)(4) a non-profit organization organized and existing under the laws of the State of North Carolina.

75. As relevant to its claims in this matter, North Carolina NAACP has produced voting records for individuals it identifies as members who identify as Black or African American and are registered voters in 2023 Senate Plan districts 1, 2, 8 & 41; 2023 House Plan districts 5, 9, 10, 12, 23, 24, 25, 27, 32 & 71; and 2023 Congressional Plan districts 1, 3, 6 & 10. These individuals are registered voters in the following counties: Vance County; Warren County; Northampton County; Hertford County; Gates County; Pasquotank County; Nash County; Wilson County; Edgecombe County; Pitt County; Greene County; Lenoir County; Wayne County; New Hanover County; Mecklenburg County; Guilford County, and Forsyth County.

76. Plaintiff Common Cause is a federally-registered 501(c)(4) non-profit organization organized and existing under the laws of the State of North Carolina.

77. As relevant to its claims in this matter, Common Cause has produced voting records for individuals it identifies as members who identify as Black or African American in 2023 Senate Plan districts 1, 2 & 40; 2023 House Plan districts 5, 7, 8, 9, 10, 12, 23, 24, 32, 37; and 2023 Congressional Plan districts 1, 3, 5 & 6. These individuals are registered voters in the following counties: Vance County; Pasquotank County; Edgecombe County; Martin County; Pitt County; Lenoir County; Wayne County; Mecklenburg County; Guilford County; Franklin County; and Wake County.

78. Plaintiff Calvin Jones is a Black citizen of the United States and of the State of North Carolina, and a resident of Norlina in Warren County and member of the Warren County NAACP. Mr. Jones's residence since 1984 is within Senate District 2, House District 27, and Congressional District 1 under the 2023 Plans and Senate District 3, House

District 27, and Congressional District 1 under the prior plans used in the 2022 election. Mr. Jones is a registered voter who has regularly voted in the past and intends to vote in the future.

79. Plaintiff Corine Mack is a Black citizen of the United States and of the State of North Carolina, and a resident of Charlotte in Mecklenburg County and Branch President of the Mecklenburg NAACP. Ms. Mack's residence since 2012 is within Senate District 41 in the 2023 Senate Plan and the state senate plan used in the 2022 general election. Ms. Mack is a registered voter who has regularly voted in the past and intends to vote in the future.

80. Plaintiff Dawn Daly-Mack is a Black citizen of the United States and of the State of North Carolina. She is a resident of Gaston in Northampton County and has been a member of the North Carolina NAACP for approximately six years and is currently a lifetime member and President of the Northampton local branch. Ms. Daly-Mack's residence since 2013 is within Senate District 1, House District 27, and Congressional District 1 under the 2023 Plans and Senate District 3, House District 27, and Congressional District 1 under the prior plans used in the 2022 election. Ms. Daly-Mack is a registered voter who has regularly voted in the past and intends to vote in the future.

81. Plaintiff Mitzi Reynolds Turner is a Black citizen of the United States and of the State of North Carolina, and a resident of High Point in Guilford County. Ms. Turner's residence since 2007 is within Congressional District 6 under both the 2023 Congressional Plan and the congressional plan used in the 2022 election. Ms. Turner is a registered voter who has regularly voted in the past and intends to vote in the future. Ms. Turner is a member

of Common Cause and the High Point, North Carolina branch of the North Carolina NAACP.

82. Plaintiff Linda Sutton is a Black citizen of the United States and of the State of North Carolina, and a resident of Winston-Salem in Forsyth County and member of the NAACP. Ms. Sutton's residence since 2011 is within House District 71 under both the 2023 House Plan and the 2022 House Plan. Ms. Sutton is a registered voter who has regularly voted in the past and intends to vote in the future.

83. Plaintiff Syene Jasmin is a Black citizen of the United States and of the State of North Carolina. Mr. Jasmin is a resident of Winterville in Pitt County and member of the North Carolina NAACP. Mr. Jasmin's residence since 2011 was located in Congressional District 1 under the 2022 Congressional Plan and is now in Congressional District 3 under the 2023 Congressional Plan. Mr. Jasmin's residence is located within Senate District 5 and House District 9 under both the 2023 Plans and those used in the 2022 election. Mr. Jasmin is a registered voter who has regularly voted in the past and intends to vote in the future.

**Defendants**

84. In January of 2025, Defendant Destin Hall replaced Defendant Timothy Moore as Speaker of the North Carolina House of Representatives, and Representatives Hugh Blackwell and Sarah Stevens replaced Defendant Hall as Co-Chairs of the House Standing Committee on Election Law.

85. Defendant Senator Paul Newton retired in March of 2025, and Senator Brad Overcash succeeded him as a current Co-Chair of the Senate Standing Committee on

Elections (formerly the Senate Redistricting and Elections Committee) along with Defendants Hise and Daniel.

86. In May of 2025, Defendant Members of the State Board of Elections Kevin Lewis and former Chair Alan Hirsch were replaced by now-Chair Francis X. De Luca and Member Robert Rucho. Defendant Executive Director of the State Board of Elections Karen Brinson Bell was replaced in May of 2025 with current Executive Director Sam Hayes. As these parties were all named in their official capacities, the successor individuals are automatically substituted for the former officeholders pursuant to Federal Rule of Civil Procedure 25(d).

***Additional Joint Stipulations***

87. All parties stipulate to the authenticity of information on the North Carolina State Board of Elections, the United States Census Bureau, and the North Carolina General Assembly websites.

88. All parties stipulate and agree to the authenticity of historical election results publicly available at the website of the North Carolina State Board of Elections, including all election results from 2012 to 2024, sorted by precinct, available on the North Carolina State Board of Elections' website.

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

90. All parties stipulate that evidence offered by any party is admissible in both Civil Action No. 23 CV 1057 and Civil Action No. 23 CV 1104, absent an objection at the time the evidence is offered.

91. State Senate Candidate for Senate District 3 in 2022, Valerie Jordan, is African American.

***Expert Tenders:***

*Williams* Plaintiffs' Experts

92. Dr. Rodden is an expert in redistricting, including drawing and analyzing redistricting plans, political and racial geography, applied statistics, geographic information systems, political science, and quantitative methods.

93. Dr. Palmer is an expert in redistricting, political science, and data analysis.

94. Dr. Clark is an expert in political science with a focus on race and electoral representation, voting, state politics, Southern politics, and quantitative methods.

NAACP Plaintiffs' Experts

95. Anthony Fairfax is an expert in demography, redistricting, and U.S. Census data.

96. Dr. Kassra Oskooii is an expert in political science, redistricting, political and voting behavior, racially polarized voting analysis and electoral performance analysis.

97. Dr. Joseph Bagley is an expert in United States constitutional and legal history, American political history, historical methods, and the historical study of southern race relations and southern politics and law.

98. Dr. LaFleur Stephens Dougan is an expert in racial attitudes, public opinion, Black politics; and race, ethnicity, and American politics.

99. Dr. James Leloudis is an expert in Southern and North Carolina history, politics, race relations, and government policy. (Co-designated with *Williams* Plaintiffs).

Legislative Defendants' Experts

100. Dr. Trende is an expert in the field of American politics with an emphasis on redistricting, including drawing and analyzing redistricting maps, U.S. Census data and political methodology.

101. Dr. Taylor is an expert in political science with an emphasis on North Carolina politics, voting and elections, North Carolina political history, and comparative state and national laws, politics, and policies.

102. Dr. Alford is an expert in voter cohesion and polarization, along with voting behavior and redistricting.

103. Dr. Barber is an expert in the field of American politics with an emphasis on legislative behavior and politics, statistical analysis and quantitative methods, political geography, U.S. Census Data and redistricting.

Dated: June 13, 2025

Respectfully Submitted,

*/s/ Hilary Harris Klein*

**SOUTHERN COALITION FOR SOCIAL JUSTICE**

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