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

NAACP PLAINTIFFS' OBJECTIONS AND COUNTER-DESIGNATIONS IN RESPONSE TO LEGISLATIVE DEFENDANTS' DEPOSITION DESIGNATIONS

Pursuant to the parties' agreement and the Court's June 4, 2025 Order on Plaintiffs' Motion to Clarify or Modify Allotted Trial Time (Dkt. 135), NAACP Plaintiffs, by counsel, respectfully submit the attached objections and counter-designations in response to

Legislative Defendants' July 17, 2025 deposition designations for the deposition of Representative Mary Price Harrison (Dkt. 159). Attached hereto as **Exhibit A** is chart identifying NAACP Plaintiffs' objections and counter-designations. Attached hereto as **Exhibit B** is a true and correct copy of Legislative Defendants' Notice of Filing of Deposition Designations, Exhibit 1 (Dkt. 159-1), with Legislative Defendants' designations highlighted in yellow and NAACP Plaintiffs' counter-designations highlighted in pink.

NAACP Plaintiffs also object to the admissibility of several documents used during Representative Harrison's deposition and respectfully refer the Court to Plaintiffs' previously filed Objections to Legislative Defendants' 5.16.25 Exhibit List for further detail. (See Dkt. 132, at 18-19 (objections to exhibit nos. LDTX200, LDTX202-LDTX207)).

Dated: July 22, 2025

Respectfully submitted,

/s/ Hilary Harris Klein
Hilary Harris Klein

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CERTIFICATE OF SERVICE

I certify that on July 22, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Hilary Harris Klein
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NAACP PLAINTIFFS' EXHIBIT A

EXHIBIT A

Defs. Deposition Designations		NAACP Pls. Objections	NAACP Pls. Counter-Designations	
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8:19	9:2			
9:15	10:15			
12:16	12:19			
14:7	14:25	14:10-14: Hearsay (FRE 802)		
15:12	16:2			
16:13	18:6			
20:10	20:13			
20:21	21:5			
25:6	26:5		198:2	198:15
33:20	34:1			
37:3	38:9			
38:10	38:24	38:10-24: Hearsay (FRE 802)		
39:3	39:6	Speculation (FRE 602)		
44:23	45:7			
45:13	45:17			
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48:6	48:22			
51:11	53:16			
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56:21	57:7			
62:14	63:25		63:25	64:17
64:18	64:21			

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69:4	69:12	Relevance (FRE 401)		
69:25	71:12	Relevance (FRE 401); 70:16-71:12: Hearsay (FRE 802)		
71:13	72:3	Relevance (FRE 401)	72:11*	74:3*
74:5	75:20	Relevance (FRE 401); 74:5-19; 74:23-24: Hearsay (FRE 802)		
77:5	77:17	Relevance (FRE 401); 77:5-9: Hearsay (FRE 802)		
78:7	80:20	Relevance (FRE 401); 78:22-79:7; 79:14-80:20: Hearsay (FRE 802)		
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89:1	89:11	Relevance (FRE 401); Hearsay (FRE 802)		
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109:13	109:20	Relevance (FRE 401)	109:21*	111:13*

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176:5	176:22	176:15-20: Hearsay (FRE 802)		
194:6	194:12		194:3	194:17

* NAACP Plaintiffs counter-designate this testimony solely in the event the Court overrules their objections to the corresponding testimony designated by Legislative Defendants.

NAACP PLAINTIFFS' EXHIBIT B

Exhibit 1

UNITED STATES DISTRICT COURT

FOR THE

MIDDLE DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO. 23-CV-1057 and 23-CV-1104

SHAUNA WILLIAMS, et al.,	)
Plaintiffs,	)
v.	)
REPRESENTATIVE DESTIN HALL, in his official CAPACITY as Chair of the House Standing Committee of Redistricting, et al.,	)
Defendants.	)

DEPOSITION OF

MARY PRICE TAYLOR HARRISON

On Thursday, October 10, 2024, commencing at 9:26 a.m., the deposition of MARY PRICE TAYLOR HARRISON, was taken on behalf of the Defendants at Nelson Mullins, 301 Hillsborough Street, Suite 1400, Raleigh, North Carolina 27603, pursuant to the Federal Rules of Civil Procedure, before Cynthia S. Boyd, RPR, and Notary Public in and for the State of North Carolina.

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MARY PRICE TAYLOR HARRISON,

the witness hereinbefore named, being first duly sworn or affirmed, was examined and testified as follows:

EXAMINATION

BY MS. RIGGINS:

Q. My name's Alyssa Riggins. We represent the legislative defendants in the case styled as Williams v. Hall which is consolidated with another case in the Middle District of North Carolina, NAACP v. Berger, and I appreciate you making yourself available to answer a few questions today. So, Representative Harrison, can you please state your full name for the record?

A. It's Mary Price Taylor Harrison.

Q. Have you ever gone by any other name?

A. Pricey Harrison, nickname.

Q. And you're here pursuant to a subpoena for this deposition; is that right?

A. Yes.

Q. And you just received a check for your statutory witness fee and mileage; is that right?

A. Yes.

Q. What's your current home address, Representative Harrison?

A. 204 Ridgeway Drive, Greensboro 27403.

Q. Have you ever been deposed before?

A. Yes.

Q. In what matters?

A. It was the voter ID case, the state voter ID -- no. State voter ID case pre-COVID, so I can't remember exactly what the date was. Jabari Holmes. That one, I think. Was that state? Yeah.

Q. Yes. There were a couple. So I think that was 2018. Does that sound about right to you?

A. Yeah.

Q. Okay. So you have done this before but it's been a few years, so I'll go over a quick ground rules.

A. Uh-huh.

Q. This is not an endurance test. If you want to take a break at any point, just let me know. Happy to do that. If you don't understand anything I ask, let me know. I'll rephrase. I try to ask questions that are clear and concise. Not always successful at it. So please just let me know. Ms. Boyd is here taking down what we say. A lot of the questions I'm going to ask will have obvious answers. But for the benefit of the record, please let me get my full question out

before you answer. Does that sound good?

A. Yes, ma'am.

Q. All right. So, Representative Harrison, can you tell me a little bit about your professional background?

A. Prior to being elected or --

Q. Yeah. We'll start with that.

A. Yeah. So I practiced law in D.C. for a few years and moved back to North Carolina and was elected to the legislature in 2004 and have served in the legislature continuously since January 2005, 20 years.

Q. Where did you practice law in D.C.?

A. It was called Haley Bader & Potts, a small boutique communications law firm.

Q. Okay. So did you practice some sort of communication?

A. Yeah. Communications law.

Q. Are you a member of the North Carolina House Democratic Caucus currently?

A. I am.

Q. What district do you currently represent?

A. It's now House District 61. It was 57 for 15 years, I think.

Q. And have your districts always been wholly

contained in Guilford County?

A. Yes.

Q. Are you running for reelection this fall?

A. I am.

Q. Do you have an opponent?

A. I do.

Q. You sounded a little surprised by that. Have you not had an opponent in recent years?

A. That would be accurate.

Q. Okay.

A. It's been a while.

Q. All right. Well, I appreciate you making time out of the campaign schedule.

A. Of course.

Q. Do you consider House District 61 to be a majority black voting age population voting district?

A. The last I looked, it seemed to be evenly divided between -- gosh. I don't remember the specific number. It was like 47 percent white, 47 percent black, and 6 percent other, Latino, Asian. That's my recollection. It's about evenly divided.

Q. Okay. Do you have an opinion on whether you're the candidate of choice for African-American voters in your district for the upcoming House

election?

A. That has been my experience which is why I generally go unopposed.

Q. Over the course of your time with the legislature, have you had any involvement in redistricting?

A. I have been on the redistricting committee for, I believe, three biennia, maybe four. I think 2019 maybe was my first -- as I recall my first year on the redistricting committee and I think I have been on it since. So maybe this is my -- yeah, third biennia.

Q. Okay. And that's the House committee for redistricting?

A. Yes, the House committee.

Q. Are you a member of Common Cause?

A. Not currently.

Q. Okay. Are you a member of the North Carolina NAACP?

A. I am a lifetime member. I joined that in 2004. A lifetime member.

Q. Is there a difference in your understanding between a lifetime member and a general member?

A. Money.

Q. Okay.

A. Give a certain amount of money. Yeah, so that's what I did. Just locked in so I wouldn't forget to pay my dues.

Q. So it's like being a member of Iron Dukes or something you can pay for the future?

A. Yeah.

Q. Got it. All right.

A. And I am a member of Iron Dukes.

Q. I thought you went to Duke. So I mentioned that instead of my Wolfpack Club.

A. Well, I'm North Carolina, too. So don't hold it against me if you're a Carolina fan.

Q. No. I went to State. So I'm the one who's constantly the most upset of the bunch.

THE WITNESS: Are you UNC?

MR. GARSON: Yes, but very ecumenical.

BY MS. RIGGINS:

Q. Do you know any of the individual plaintiffs in these cases?

A. I don't have a list in front of me. Shauna Williams. Is she the lead?

Q. Yes.

A. But I think it's a different Shauna Williams than the Shauna Williams I know. I think

there are two people named Shauna Williams that I know. I believe she was a delegate. The plaintiff was a delegate in Chicago, so I probably met her. But I wouldn't say I'm on a personal basis with -- not that I recall. I don't have the list.

Q. Okay.

A. I didn't talk to any of them. I don't have the list. I didn't pay attention.

Q. Do you have any understanding of the claims that were brought in these consolidated lawsuits?

A. You know, I don't. I didn't read it.

Q. That's fine.

A. I normally do but I didn't. So anyway, I don't actually.

Q. All right. So you were a member of the House redistricting committee in 2023; is that right?

A. Uh-huh.

Q. To the best of your knowledge, did you attend most of the redistricting committee meetings?

A. My recollection is I attended all, including the hearings. Well, those weren't -- well, I guess they were technically part of the

committee process, the three public hearings. So one in person and two remote I attended and then all the Raleigh meetings is my recollection.

Q. Perfect. Do you know if the House Democratic Caucus hired an outside consultant to draw proposed House maps in 2023?

A. I do not know that, actually.

Q. But are you aware that Representative Hall offered to make funds available to the House Democratic Caucus should the caucus want to hire an outside firm?

MR. GARSON: Object to the form. You can answer.

THE WITNESS: No. I don't know. I did not know. I'm not aware. Sorry. I'm not aware.

BY MS. RIGGINS:

Q. I'm going to show you a document, Representative Harrison, that was produced pursuant to the document subpoena you received in this case.

A. Uh-huh.

Q. And it's Bates labeled Harrison 00015, and so the court reporter's going to mark it.

(Exhibit 1 marked for identification.)

BY MS. RIGGINS:

Q. Representative Harrison, have you seen this document before?

MR. GARSON: Take your time.

THE WITNESS: Yes. I know I produced it. Yeah, okay.

BY MS. RIGGINS:

Q. All right. What's the date of this e-mail from Chairman Hall to Representative Rieves?

A. August 23rd.

Q. Okay. And in the e-mail it looks Representative Hall indicates that Room 512 was set aside for the Democratic Caucus; is that right?

A. Yeah. I remember him mentioning it in the committee.

Q. Okay. Did you personally use Room 512 in the Legislative Office Building to draw any proposed North Carolina House maps in 2023?

A. No.

Q. Are you aware of any members of the Democratic Caucus who did?

A. I am not.

Q. Okay. Are you aware of any staff members who work for members of the Democratic Caucus who used Room 512?

A. I am not aware.

MR. GARSON: Representative Harrison, if you can let her finish asking her question.

THE WITNESS: Oh, I'm sorry.

MR. GARSON: No, no. All good. And then give a pause, just the slightest pause. You're a naturally fast talker.

THE WITNESS: Yes.

MS. RIGGINS: I am, too. So we also don't want to kill Ms. Boyd.

THE WITNESS: I apologize.

BY MS. RIGGINS:

Q. And do you see in Exhibit 1, too, that Representative Hall tells Representative Reives if the Democratic Caucus needs any further assistance or additional resources, to let him know?

A. I see that now. When I read that, Representative Hall mentioned the availability of Room 512 in the committee meeting on -- I believe it was October 19th. And I was not aware of this e-mail until then. And so when I -- I can't remember when we received this, when it was given to regular rank and file caucus members. And quite frankly, I did not read the line about the resources. I knew that the room had been made available, but I didn't focus on that fact that the

resources had. So I actually wasn't aware that the offer was for resources as well.

Q. Okay. Did you do anything to prepare for the 2023 redistricting process?

A. I'm sure I did. I'm trying to remember exactly what I did. You mean any time up until the September public hearings or --

Q. Sure. That's a fair counter question. So let's say did you do anything to prepare for the 2023 redistricting process from May 1st, 2023 to September 1st, 2023?

A. I honestly do not recall.

Q. Okay. What about from May 1st, 2023 until, you know, the hearings started in late September, early October?

A. So on the timetable, I don't know where this fits in now that you rephrase it or you -- yeah, augment it. I am fairly certain that our redistricting committee got together, the House Democrats on the redistricting committee. I'm fairly certain we got together at some point in there and talked about process and perhaps strategy but I can't place it on that time table.

Q. Do you recall speaking with anyone outside of the General Assembly in the fall or summer of

2023 leading up to when maps were released about redistricting?

A. I am -- pause. I am sure that I did because I'm very active in elections issues and redistricting issues and I'm sure that we had internal conversations in our caucus about -- we talked about when we might get started on the drawing, what should we do in advance of it. I'm sure I had those internal conversations with leadership, with my colleagues. And perhaps advocates were asking me what I knew and what we were doing, I'm sure, because a lot of the applicants are personal friends. So I'm sure but I can't pinpoint an exact conversation. I just know they were happening because we knew we wanted to get the maps done in time to have all the potential public hearings and potential challenge if it happened.

Q. Are there groups that you consider to be advocates?

A. Yes.

Q. Who are those groups?

A. Well, I would say advocates in the redistricting arena, yes. I would say Common Cause has been active. I would say Southern Coalition

for Social Justice is active. I would say Democracy North Carolina. I think All On The Line but less -- well, no. All On The Line or it used to be the -- well, I think it's called All On The Line. Less interaction with them. No interaction with them, but yes.

Q. Do you recall if you spoke with anyone with the National Redistricting Foundation about redistricting for the 2023 cycle?

A. I do not recall. I don't even know who -- I'm not sure I even know who they are. I mean I know who they are as a group. I don't know the individuals this time around. I don't believe I did. I don't recall but I don't have a reaction that I did.

Q. What do you know about the National Redistricting Foundation?

A. Well, it was started by Eric Holder and they, I believe, had been involved in redistricting challenges around the country and started as a counter to REDMAP, I think was what I heard originally, and have been around I think since Mr. Holder left the White House. So it would be like 2013 or something. They did have staff here or I guess they technically are connected with the All

On The Line people. I do think that they had staff here involved in the 2021 redraw, and I did have conversations with them then but I don't know who that is this time around. That's about all I know. Yeah.

Q. Okay. And when you say Project REDMAP, is that the 2010 Republican National Committee Project REDMAP that you were referring to?

A. Yes.

Q. Is it your understanding that the National Redistricting Foundation funded a litigation challenge to the 2021 North Carolina redistricting plans?

A. That is my understanding. I think there were a few groups that were funding redistricting challenges because I think there were multiple. Yes, because like LCV and so like -- but I believe they were funding. I'm just not sure which one they were funding, if they had their own or if they were funding through another plaintiff.

Q. Okay. Do you have any understanding if the National Redistricting Foundation is funding this litigation?

A. I have no knowledge of that.

Q. Do you have any knowledge of where the

funding for this litigation is coming from?

A. I do not. If Southern Coalition for Social Justice is one of the attorneys for one of the plaintiffs, I know that they get some foundation money. But I don't know their list of funders and I don't know if the plaintiffs are contributing to the legal effort. So I guess I don't have direct knowledge is the answer that I can speak to beyond that.

Q. Do you recall communicating with someone named Ann Webb in September of 2023 about redistricting in North Carolina?

A. I do.

Q. Do you recall if that was by text message?

A. Well, I know -- sorry. I know that there were some text messages produced and I know there was discussion about the timing and I can't remember what else we talked about via text. But, yes, I speak with her pretty regularly about a host of issues but definitely about redistricting.

Q. Okay. And how do you know Ann Webb?

A. I know Ann Webb because she used to be at ACLU and I worked with them a lot on issues, a variety of issues from reproductive rights to criminal justice reform to elections. And she's

been with Common Cause for a while now and I talk to her regularly about a number of issues.

Q. Is she an employee of Common Cause?

A. I believe she's the full-time policy director or legal or something, yeah.

Q. Okay. I'll go ahead and show you those text messages because it's not a memory test.

A. Good.

Q. For the record, it's Harrison 00300 to 303. We'll mark this as Exhibit 2.

(Exhibit 2 marked for identification.)

BY MS. RIGGINS:

Q. I'll give you a minute to look through these.

A. Oh, August. Okay. I've looked through. I might want to review if you ask me a specific question.

Q. Sure. So, Representative Harrison, is it your understanding that the white text bubbles are from Ms. Webb in these text exchanges and the blue text bubbles are from you?

A. Yes.

Q. And it looks like -- and I apologize it's hard to see. But it looks like the date on the top of the first text on Harrison 00300 is Tuesday,

September 26, at 10:31 a.m. do you see that?

A. Yes.

Q. Okay. And it looks like this is the first text in the conversation you had with Ms. Webb that was produced here; is that right?

A. I believe so, yes.

Q. Okay. So at the top right-hand corner of the page it says, "Monday, August 12, 2024 at 10:30:18 Eastern Daylight Time." Do you see that?

A. Yes.

Q. Do you know why that date or time stamp is there?

A. Production of documents, the date that we produced on August 14th or something. I think that's the purpose of that.

Q. Got it. Okay. So going back to the body of the first text message, it looks like Ms. Webb is asking you about the 2023 redistricting timeline; is that right?

A. Yes.

Q. Okay. And then she says, "Sorry if you and Bob already talked." Is that right?

A. Yes.

Q. Do you have an understanding of who the Bob is that's referred to in this text?

A. It's Bob Phillips, who is the executive director. We talk all the time about all kinds of things. He's a good friend.

Q. He's a very nice man.

A. Yes.

Q. All right. And then it looks like your full response is on the next page. And you let Ms. Webb know that there would be a good chance that it would be the week of October 16th; is that right?

A. Yes.

Q. Okay. And then she thanks you and you say -- it's cut between two text blurbs. It says, "PS he made the same comment re public" something "with Senate GOP colleagues." Is that right?

A. Yes.

Q. And then that's continued down below?

A. Yes.

Q. All right. And the last sentence of that first text says, "Destin told me Dallas info is unreliable"?

A. Yes.

Q. Who is Dallas?

A. Dallas Woodhouse.

Q. Okay.

A. And my recollection is he had an expectation of the timeline and I was repeating that to Destin and I think Destin clarified.

Q. Got it. So the idea was that Mr. Woodhouse had said something about the timeline and it was not correct and you were correcting the record?

A. Yes.

Q. Is that right?

A. Yes.

Q. Okay. And then you say, "PS he made the same comment re comment portal." Do you see that? It's the last blue blurb on the page.

A. Oh, yeah. That was regarding the public comment portal.

Q. Okay. Do you recall what comment you were talking about, about the public comment portal there?

A. I don't recall. My guess is it had something to do with the availability of the public comments because that question kept coming up. It came up in 2021 and it came up in this. So I don't know why it seemed so obtuse here. I must have been responding to something oral, not in text.

Q. Okay. And by the public comment portal,

are you referring to the public comment portal that opened from the General Assembly's website where people can comment about redistricting and proposed maps and things like that?

A. Yes.

Q. All right. And then the next page, which is Harrison 00302, it looks like the e-mail -- the produced text chain picks back up on Tuesday, October 17 at 5:25 p.m.; is that right?

A. Yes.

Q. Okay. And here it looks like Ms. Webb says, "I just sent an e-mail to your official account with an attached document with suggested questions." Did I read that correctly?

A. Yes.

Q. Okay. When she says official account, do you know what e-mail account she's talking about?

A. She is talking about my legislative account, my NCGA account.

Q. Okay. And do you recall sending or, sorry, receiving this e-mail that Ms. Webb references in this text message?

A. I could not pinpoint it in that stack of documents that you have but I know that -- so at that point, I believe we had an October 19th

committee meeting notice and I believe that it was a list of questions that we might want to raise in the committee if it hadn't come to us nationally. I'm not visualizing it right now but I'm sure it's in that stack.

Q. Okay. And then it looks like the text message chain continues down and the next text exchange would be Thursday, October 19th, at 11:59 a.m. Do you see that, the video?

A. Right, the video. Sorry.

Q. And do you believe Ms. Webb is referring to the video feed during the October 19th House committee meeting?

A. Yes. Often when the feed stops, I get a text from somebody telling me to tell the leadership in case they weren't aware. Because I think the folks in the room aren't aware when the video stops. So I think it was from the public, from my LA, yeah. I watch my phone during the committee meeting, so I think she knew I would see it.

Q. Okay. And then a couple texts down you said, "Destin volunteered." And it looks like Ms. Webb liked that. Do you have any idea what you meant when you sent that?

A. I do happen to know because he re-listened to that committee hearing on the 19th and he knew -- he said we've got to hold off a second because we're getting word that the video has stopped. But then he said we've got two of the five cameras working, so we can proceed. So that's what that referenced. That would be my recollection.

Q. I think you're probably right. I think I was listening to it, too.

A. I don't want to listen to it again.

Q. I promise you I am not going to play it for you again, Representative Harrison.

A. Three times was enough.

Q. Okay. I would like to ask you about another document produced in this case which we will mark as Exhibit 3, please. And it's going to be for the record Harrison 00281 to 282.

(Exhibit 3 marked for identification.)

BY MS. RIGGINS:

Q. Representative Harrison, these are two pages in your document production that look to be screenshots of your calendar?

A. Uh-huh.

Q. And so it looks like on Tuesday, October

3rd, 2023, you were scheduled for an hour long meeting called "Zoom on Redistricting." Do you see that?

A. Uh-huh.

Q. Did you attend this meeting?

A. I would be surprised if I didn't. I don't have a specific recollection of this October 3rd meeting but I would not miss a redistricting meeting.

Q. Okay. Do you have any recollection about who was present for this meeting or where the meeting invitation came from?

A. It's my recollection that we had a redistricting -- our House Democratic redistricting committee's meeting. And sometimes they were on Zoom. So that's my guess is that was a -- it's House Democratic members or it could have been the whole caucus, but it would have probably been the House, House Democrats.

Q. Okay. And then looking at the next page, it looks like this is a screenshot from your calendar on Thursday, October 12th, 2023.

A. Uh-huh.

Q. There's an entry on here for another redistricting call. Do you recall if you attended

this meeting?

A. I don't have a specific recollection again about the meeting. I do have a specific recollection about the marine debris symposium because I was there and that was in Beaufort. I do remember that. This was later in the day the event was over. So I would be surprised if I wasn't on it but I don't have the details of that, to be honest.

Q. Okay.

A. It all just kind of muddles together. There are a lot of these. And assigning them to any specific date is difficult.

Q. I would like to show you another exhibit which we will mark as Exhibit 4. And these were previously produced as Harrison 000308 to 310.

(Exhibit 4 marked for identification.)

BY MS. RIGGINS:

Q. I'll give you a minute to look through these text messages, Representative Harrison.

A. Okay.

Q. So are these screenshots of text messages that you exchanged with Hilary Klein?

A. Yes.

Q. Okay. And is it your understanding that

the blue bubbles are texts from you and the white bubbles are texts from Ms. Klein?

A. Yes.

Q. I'm sorry. It's a funny thing to have to ask but I was once in a hearing where the judge was, like, how do I know which color is which? And I was, like, I'll have to ask that in a deposition.

A. Starting to make me feel unsure of myself.

Q. Once bitten, twice shy. It's my own insecurity here.

Do you understand Ms. Klein is one of the attorneys for the NAACP plaintiffs and Common Cause plaintiffs in this case?

A. Yes.

Q. Okay. How do you know Ms. Klein?

A. I believe I first met her when I was a witness on the voter ID case. I worked with her on Jabari Holmes. That case. That's where I first met her.

Q. And so it looks like the first dated text we see is Thursday, October 5th, at 2:29 p.m. Do you see that?

A. Yes.

Q. And there's some undated exchanges above that. Do you recall when the first exchanges on

this screenshot occurred?

A. So I can't give you an exact date. And I'm not sure why when I was producing this -- I clearly am not adept at this because I don't even know how you share the text. But my recollection would be if I'm thanking her for her comments, her remarks, it would be the ones I believe that she made in Raleigh at the Raleigh public hearing. That date I don't remember. I believe they were sometime late September, mid September or late September, the Raleigh -- the live stream. Because I did not attend that. I watched the live stream.

Q. Okay. And then it looked like on October 5th you tell Ms. Klein that you are starting to get public comments from the portal forwarded to you on the committee; is that right?

A. Yes.

Q. All right. And the full text exchange, sorry, is on the next page, on 309. And do you offer to forward those public comments to Ms. Klein?

A. Yes. And the reason is, is that for some reason these comments weren't being made available to the public. The public comments weren't being made available to the public, and that started at

least in the 2021 redraw. So we got a number of requests from folks who were interested in seeing them in 2021. And we would forward them as Erica Churchill gathered them because they were public but they weren't being made available to the public. So we facilitated that and I planned to continue to do that for the 2023 redraw, which is why I reached out, because I believe some of these groups were interested in going through them.

Q. Okay. And it looks like Ms. Klein responded to you that they were already getting them; is that right?

A. Yes.

Q. Do you have any understanding of who was sending the public comments to Ms. Klein?

A. I have no idea.

Q. All right. So I would like to mark as Exhibit 5 another document you produced in this case. Harrison 00023 to 31.

(Exhibit 5 marked for identification.)

BY MS. RIGGINS:

Q. These appear to be something called Decision Summary from Allen v. Milligan and Harper v. Hall III.

A. Uh-huh. I remember this document.

Q. Okay. Do you recall -- well, let me ask you this. Did you prepare these decision summaries?

A. I did not. Not that smart. I did not.

Q. Do you recall -- well, where did you obtain these decision summaries?

A. I honestly do not remember. I recall asking. I don't know if it came from our staff or if it came from one of the advocates because I was trying to understand where we were in redistricting litigation. I knew that the Milligan decision had just come out and upheld Section 2 and that that would play some role in this. So I don't know if I asked Common Cause if they had done something or SCSJ or if I asked Todd Barlow because I was trying to understand. It was very confusing to me. There were so many decisions out there and I couldn't keep them straight. So I asked somebody and I just honestly don't remember who prepared it for me.

Q. Okay. You mentioned a name that I don't think's been brought up before. Todd Barlow. Who is that?

A. Todd Barlow is the chief of staff to our minority leader, Robert Reives. And Todd's a lawyer and he's been involved in redistricting

since way before he came to the legislature. I'm guessing he didn't do this but he might have obtained it. I don't know. But I don't know that I got it from him but I really -- I promise you I can't remember.

Q. Okay. Do you ever seek any legal advice from Mr. Barlow?

MR. GARSON: Object.

THE WITNESS: I don't think I would call it legal advice. Strategy. Because he is the leader's chief of staff and -- yeah, so I think that about redistricting, I seek advice from him. I would say that would be where I most seek advice but I don't know that I would call it legal advice. Just strategy more than legal advice.

BY MS. RIGGINS:

Q. I just wanted to make sure I was not encroaching in any privilege.

A. Oh, sorry.

Q. Anybody that's an attorney and I did recall that Todd was an attorney and I just wanted to make sure.

A. No, no. Not attorney-client privilege.

Q. Okay.

A. I don't think. Maybe. I don't know. Is there attorney-client privilege with the lawyers of the -- I don't want to waive it if I have it but I'm not going to be using his name again, I don't think.

MS. RIGGINS: Do you want to take like three minutes and you guys talk about it?

MR. GARSON: Yes.

(Recess taken.)

BY MS. RIGGINS:

Q. Representative Harrison --

A. That's so organized. I wish mine looked like that.

Q. People take good care of me here.

A. I've got a tote bag with a bunch of papers in it.

Q. So the exhibit that's in front of you which I believe is Exhibit 5, right?

A. Right.

Q. So you don't recall where you received these decisions?

A. I really don't. I would be speculating and I don't think that's good.

Q. Fair enough.

A. I mean obviously it came from a lawyer who

I asked to give me an idea of where we were in the litigation but I just don't remember which lawyer.

Q. Do you recall discussing these decision summaries with anybody?

A. I am -- yes, I do. I'm thinking that I probably taught -- because of the Section 2 piece of -- well, the Milligan decision had just come out a few months prior and it seemed to uphold the Section 2 about VRA districts. I might have talked some to Hilary Klein because they sent us that letter and highlighted that issue. And I knew that these VRA districts kept coming up because it came up in 2021, too, also in the House. District 10, I think. So it probably was some with Hilary. It might have been some with Bob Hall. I mean Bob Phillips, not Bob Hall. I mix them up. Bob Hall not involved at all in this.

I probably talked to maybe Ann Webb as well. But as I said, I don't have a specific memory of who I talked to about this. I will say I don't think I asked anybody to produce this document. I think somebody said they had it because that was a lot of work.

Q. Yes. Okay. I would like to mark another document produced by you in this case,

Representative Harrison, produced as 00093 through 98, as Exhibit 6.

(Exhibit 6 marked for identification.)

BY MS. RIGGINS:

Q. Do you recognize this document, Representative Harrison?

A. I do.

Q. Okay. And what is this document?

A. Well, this was sent to us prior to the redistricting process but I believe it was after the hearings, the three hearings, and it was sent -- I believe it was sent -- well, I'm not sure. I think it was SCSJ, Southern Coalition for Social Justice, that sent it to us but it was on behalf of all these organizations.

Q. The organizations listed on page 4 and 5 --

A. Yeah. Sorry.

Q. -- of the letter? Okay.

A. But actually it may have come from Democracy NC but it didn't have letterhead, so -- I know I had multiple copies of some of these letters in that document production and some had letterhead and some didn't. Yeah.

Q. Okay. And the letter is dated September

25th, 2023; is that right?

A. Yes.

Q. Okay. And there's some highlighting on the document. Did you do that highlighting, Representative Harrison?

A. Yes.

Q. Okay. And there's some handwriting on here as well. Is this your handwriting?

A. Yes, that is mine.

Q. Okay. I want to ask you a couple of questions about this document. So at the very top of the page, it looks like you wrote, "Don't say anything complimentary" and it's circled; is that correct?

A. You read that right.

Q. Why did you make that note?

A. I'm guessing I made that note because I was very polite and complimentary of a previous elections-related proceeding, specifically where David Lewis was involved, and that was used against us. And so someone had advised me to not be so complimentary. I'm not very good at not being complimentary, so I'm not sure why I wrote it down. It's pretty obvious.

Q. It's the women raised in the south thing,

right? I hear you.

A. Yes.

Q. And so do you recall who advised you not to say anything complimentary?

A. I do not. I'm guessing it came from our team, our House Democratic leadership.

Q. Okay.

A. But I don't remember a specific person. But I do know the circumstances was that we -- the fact that we were so polite in the voter ID case kept coming up in the trial.

Q. In the --

A. The Jabari Holmes trial because we were so polite in complimenting, whatever we said. Yeah. So anyway.

Q. And do you recall if maps had been released as of September 25th, 2023, which was the date of this letter?

A. September '25?

Q. I'm sorry. Did I say -- September 25th, 2023. I apologize.

A. So my recollection is the maps didn't come out until the 18th, the night before the committee meeting on the 19th of October.

Q. So the maps had not come out as of the

date you received this letter, based on your recollection?

A. That's my recollection.

Q. Okay.

A. Do you mind if I check my phone real fast? I apologize.

Q. Sure.

(Brief pause.)

A. It's all good thank you.

Q. And so the first bold header on page Harrison 93 says "Implement a Redistricting Timeline That Allows for Informed Public Comment"; is that right?

A. Yes.

Q. Okay. Do you recall if there were hearings spread throughout the state of North Carolina in 2021 before the redistricting maps were released in that year?

MR. GARSON: Objection to the form.

THE WITNESS: You're asking about 2021?

BY MS. RIGGINS:

Q. Yes.

A. So my recollection was that there were 14 corresponding to the 14 congressional districts. Although, the 14th District was new, so I can't

remember how that translated. My recollection is there were 14 post draw, I believe, was my recollection in 2021, post map draw.

Q. And then on the next page, which is Harrison 94, it looks like at the top it says 2011-63, 2021-14, 2023-3. Do you see that?

A. Yeah.

Q. Do you know what that refers to?

A. I do. In 2011, the redistricting -- there were 63 hearings, the details of which I can't recall. I went to many of them but my recollection maybe was that there were before and after maps but I'm not sure. But there were -- there were 63 and, yes. Because I raised that point a lot during the debate, about 63, about the multitude of public hearings and previous redrawings versus 2023 when we had three.

Q. And then to the right of that, so at the top of the page, it looks like it says, "2019 all drawn under faulty constitutional legal theory"; is that right?

A. So that's what you're reading, yes. Do you want me to -- do you want me to tell you what that is?

Q. Yes, please.

A. Okay.

Q. Or if I mixed those together.

A. No, no. I don't know if the constitutional might have been -- no, I know. Constitutional refers to our constitutional prohibition on mid decade or redraw, which would refer to the sentence prior: Population hasn't changed. Why do we have new maps?

Q. Gotcha.

A. Because I remember Chair Hall said the population hasn't change in some of his description about the maps. The "2019 all drawn under faulty legal theory" was a note kind of quoting Chair Hall, who I think his explanation there was that we get to draw -- we'll get to ignore that constitutional provision because it was based on that there was a faulty legal theory that drove the 2022 maps. Or the 2019 Superior Court decision, I believe he was saying, was made under faulty legal theory. That's my recollection of what that sentence means.

Q. Okay. And would the 2019 Superior Court case that you're referring to be Common Cause v. Lewis, if you recall?

A. So I don't recall because I don't

remember. I can't keep track of all those cases. But I do remember Representative Hall and I having an exchange about that after listening to the transcript -- I mean listening to the hearing again. He distinguished like whether it was the Supreme Court that held that or whether it was the Superior Court, but I think he corrected me that it was the 2019 Superior Court.

Q. Great. Did you read the April 2023 Harper v. Hall opinion that came down from the North Carolina Supreme Court?

A. I wish I could say that I had but I did not. I generally try to read, actually, the legal cases. But in that case, there was just too much, which is why I think I relied on maybe the summary that was provided.

Q. Okay. So do you know if this idea that the ability to redraw was allowed came from the Harper v. Hall decision in April of 2023?

MR. GARSON: Objection. Calls for legal conclusion. You can answer.

THE WITNESS: Okay. So the -- you're referencing the United States Supreme Court or the North Carolina Supreme Court?

BY MS. RIGGINS:

Q. The North Carolina Supreme Court decision in Harper v. Hall in April of 2023.

A. Right. It was Moore v. Harper, US Supreme Court. Okay. I actually have some recollection that the Court said it was okay to redraw all the districts, not just the congressional.

Q. Okay.

A. Hence the faulty legal theory about partisan gerrymandering. I'm not saying it was faulty.

Q. Yes. You were referring to the Court?

A. Yes.

Q. We're clear.

A. It was not faulty from my perspective.

Q. All right. And then the header that's in kind of the middle of the page here on Harrison 94, "Provide Genuine and Meaningful Opportunities for Public Comment." Do you see that?

A. Uh-huh. I do. Sorry.

Q. And bullet 1 talks about an easily accessible redistricting website; is that right?

A. Yes.

Q. Okay. And are you aware that they generally have a redistricting website that posts all redistricting plans dating back to the 1990s?

A. I actually -- I know they have a redistricting website but actually I don't believe I have been on it. So I don't know actually what's on the redistricting website. I don't believe I have specific knowledge of what's on the redistricting website. I'm aware that there is a redistricting website.

Q. Okay. So you don't know if the information in bullets a., b., and c. here are contained on the North Carolina General Assembly's redistricting website page?

A. I am not aware.

Q. Okay. I think we talked about this earlier, but are you aware that the House redistricting committee hearings were live streamed online?

A. I am aware of that.

Q. And then on the next page, Harrison 95, it looks like you put a check mark by bullet 7. Is that right?

A. Yes.

Q. Do you recall why you did that?

A. I don't recall specifically. But as I mentioned before, bullet point c., the public access to comments, I think I probably wanted to

raise that point again. Because we did have the online comment portal but it seemed strange that those comments weren't allowed to be seen by the public. I believe that's probably why I check marked, to make sure I raised the point in committee.

Q. All right. And on the next page, Harrison 96, there is a highlight in that first full paragraph. Do you see that? It starts with "advocates from both sides."

A. Uh-huh. Sorry. Yes.

Q. And it references a last-minute addition to the state budget. Do you see that?

A. Yes.

Q. Okay. Is it your recollection that the budget for North Carolina had been passed at the time that you received this letter on September 25th?

A. To be honest, I can't remember the exact date when we published the budget. Wait. No. Okay. We did have a budget. I don't remember the date that the budget was passed. To be honest, like, I have been there a really long time and some budgets never got passed and some got passed really late and some got passed early. So it's hard to

remember in this context when it was. But if they referenced that provision, then it would have, I believe, passed by then.

Q. Let me ask you something that may help jog your memory. Do you know or do you recall if any redistricting maps were released prior to the passage of the budget in 2023?

A. The answer to that would be no because the maps were available to the public on October 18th and the budget was passed before then. I just cannot recall what day. Just think about it for a second. Summer of 2023. I just can't remember when the budget was passed. My recollection is a whole redistricting process happened after the budget was passed.

Q. Okay. I believe you mentioned that maps were released to the public on October 18th, 2023; is that right?

A. That's my recollection.

Q. Is that the first day that you also saw draft maps released by Chairman Hall?

A. I don't remember specifically looking at them that day, that evening, I guess. I may have. I believe all the maps dropped that day, I believe. I don't remember when I first looked at them. I'm

sure in anticipation of an October 19th redistricting committee meeting, I'm sure I looked at the House map prior but I just can't visualize that experience. It's hard to read them on a computer, too.

Q. I agree with you. So were you present for the October 19th, 2023 House redistricting committee meeting?

A. I was.

Q. Okay. Is it your understanding that racial data was not used in the creation of the 2023 House plan?

A. Yes. Chair Hall repeated that.

Q. Do you have any reason to believe that race was used in drawing of the districts?

A. I don't. But I don't know how they created the maps except Mr. Springhetti helped them. I don't have any idea. He said that race wasn't used. We've had some racial gerrymandering decisions in the past. So I'm sure that's what drove him to say that and I assume he was speaking the truth.

Q. You said "we've had some racial gerrymandering decisions in the past." What cases are you referring to?

A. Well, the one I remember -- I can't remember what the case -- yeah. I believe we've had a racial gerrymandering case where they overturned maps. Maybe I'm misremembering but that's my recollection because there was a deliberate effort to make sure that for the record it was stated in 2021 and in 2023 that racial data wasn't used. I believe that in both instances.

Q. Okay. Do you recall if you raised any concerns about the redistricting process in the October 19th, 2023 House committee meeting?

A. I believe I raised a few concerns.

Q. Okay. Can you tell me a little bit about the concerns you recall raising?

A. I recall raising concerns about the process, the lack of public input and public opportunity. I recall raising -- I recall raising -- well, general comments about the timeline. I mean I raised concerns that have been raised in here in this letter. I raised -- I asked about the criteria that was used. Chair Hall mentioned Mr. Springhetti's involvement and giving him some guidelines. And I remember asking about the criteria based on we had 2021 criteria and I recall that Chair Hall said he was going to

distribute that after I raised the point in committee.

I believe I raised the potential for VRA districts in the maps because I believe this came up in 2021. So I was familiar with the issue that -- and with the Milligan decision having recently been made, I'm fairly certain it was in the 18th -- I mean the 19th meeting. It could have been the 23rd but I think I started the discussion in the 19th, about the need to have racially polarized voting analysis. And the Stephenson decision requiring that those VRA districts be drawn first even before you do the county clusters and some -- I believe that I raised those concerns in the 19th meeting.

I may have asked about the compactness in that meeting. It may have been the 23rd. And I believe that's -- I may have raised more because I know I talked a lot in that meeting and I talked, I think, three times. So -- if you'll give me one second, I'll look and see if there's something in this that jogs my memory about anything else I might have raised. I think that might have been it.

Q. All right.

A. But I'm sure there are more.

Q. You have a very good memory, Representative Harrison, so I will be able to keep my promise not to play anything for you.

A. Thank you. I know because that's always embarrassing.

Q. I would like you to look at another document produced to you in this case, which would be Harrison 000106 to 107. We'll mark this as Exhibit 7.

(Exhibit 7 marked for identification.)

BY MS. RIGGINS:

Q. I'll give you a minute to look at this, Representative Harrison.

A. I remember it.

Q. Okay. So can you tell me what the document is, Representative Harrison?

A. These are questions that someone prepared that -- potential questions that should come up that we should raise in the redistricting committee.

Q. Were these the questions that Ann Webb sent you that was referenced in the text messages we looked at earlier?

A. Actually, I mean I don't know if they came

from Todd Barlow or from Ann Webb. I'm just not sure but it could have been. I don't want to say yes because it might have been from Todd.

Q. Sure.

A. Well, she referenced the 2021 -- she referenced the 2021 link in there and maybe it was hers, on the text.

Q. That's fine because you've got Exhibit 1 in front of you if you want to pull it up.

A. Yeah. I remember she referenced that and I know I asked about that because I had the 2021. It's a good chance it came from her but I don't want to swear on it because I think there's a chance it might have come from Todd.

Q. I'm sorry Exhibit 2, page 302.

A. Yeah. I was on page 301.

Q. Yeah. On page 302.

A. Yeah, I'm looking at it.

Q. The link to the advocacy letter.

A. Yeah. Then that must have been the one she sent.

Q. Okay.

A. Thank you.

Q. So you believe it's likely that you received this from Ann Webb, who is an employee of

Common Cause; is that right?

A. Yes.

Q. Okay. And is it your understanding that these were provided to you as potential questions for you to raise in the committee meeting on October 19th, 2023?

A. Yes. And I will just augment that by saying often when we have committee meetings on various issues from the environment to elections, advocates give us questions that might be good to raise in a committee meeting. We don't really have much of a staff. I have a great staff. It's one person who is an expert in everything. So I often rely on advocates to send me information specific to issues that they have knowledge on and this is normal, sort of normal operating procedure for us.

Q. Okay. And so it looks like maybe in yellow highlighter like at the very top middle of the page --

A. Uh-huh.

Q. -- is that 76 percent? Is that what that says?

A. Yeah.

Q. Do you have any idea what that references?

A. You know, I don't. It might come to me

but I don't really.

Q. That's fine. And then to the left it looks like you wrote "Wake and Meck no RPV"; is that right?

A. Yes.

Q. Do you have an understanding of why you wrote that?

A. I am sure I wrote that because somebody said that. That was not a conclusion I drew myself because I'm not -- yeah. So somebody said it and I don't know if it was somebody in committee said that or if it was somebody -- I don't know who -- that was not my conclusion. I was writing down something that somebody said and I don't know who said that.

Q. Okay.

A. It could have been -- I don't think it was Chair Hall. I mean it could have been anybody who said that.

Q. Sure. Do you have an understanding -- well, what did you mean when you wrote "RPV"?

A. Racially polarized voting.

Q. Okay. And then it looks like you highlighted a portion of bullet 5. Do you see that?

A. Yes.

Q. Do you recall why you highlighted this?

A. Well, I just -- I know I raised that point a number of times and I thought it was a really important point that Stephenson v. Bartlett says that this -- because this was an argument that we continue to have during the redistricting debate about the existence of racially polarized voting and VRA districts and the reliance on the Stephenson -- that Stephenson's very clear that you need to draw the VRA districts before drawing the rest of the maps. And so I think I just wanted to make sure I didn't forget that point. I don't know how I thought I would forget it because I raised it a lot but I just wanted to make sure I made that point. And it may have been that sometime, like, we're in the committee and I hadn't said what I wanted to say yet and so I'm highlighting it to catch my -- because I write notes clearly on everything.

Q. Is it your recollection that you took this document in with you to the committee meeting on October 19th, 2023?

A. Yes.

Q. And it looks like kind of next to bullet

5, you wrote "Gingles not present"; is that right?

A. Yes.

Q. Do you recall why you made that note?

A. Yes. That did not come from me. I believe that was what Chair Hall said.

Q. Okay.

A. That Gingles v. Thornburg conditions weren't present, those three -- the Gingles test. I believe that he was saying -- and I believe it was a response to my point about the VRA districts. So that was quoting Justin -- I mean, sorry, Hall.

Q. Did you or your staff conduct any independent analysis of the Gingles factors?

MR. GARSON: Objection. You can answer.

THE WITNESS: The answer is no because, as I said, I don't really have staff. I mean I've got one person and has to do a whole lot. So, yes, I wouldn't even know how to do it.

BY MS. RIGGINS:

Q. Do you know if anyone in the House Democratic Caucus conducted a Gingles analysis?

MR. GARSON: Objection. You may proceed.

THE WITNESS: I don't. I do not know.

BY MS. RIGGINS:

Q. Did anyone -- do you know if anyone in the House Democratic Caucus contracted with anyone to conduct a racially polarized voting analysis?

MR. GARSON: Objection. You may proceed.

THE WITNESS: I do not know.

BY MS. RIGGINS:

Q. So it looks like beside bullets 6 and 7 on the left, you wrote "No Stephenson violation." Do you recall why you wrote that?

A. I'm not sure -- okay. I am thinking, like, I wrote down "Gingles not present," which was not what I thought. And clearly I didn't think there was no Stephenson violation. So I'm thinking I was writing down what Chair Hall was saying in response to the points I was raising. And so -- because that was not my conclusion. Because clearly I think there was a Stephenson violation because the VRA districts were not drawn. So that's my recollection. Or actually, that's my -- yeah, that's my recollection.

Q. And so was it generally your belief at the time of the October 19th committee meeting that the Gingles factors were present?

MR. GARSON: Objection. Calls for a legal conclusion. You may proceed.

THE WITNESS: So it was a long time ago when I looked at the Thornburg v. Gingles or Gingles v. Thornburg decision and I am not an expert on constitutional law. So I'm not sure that I -- can you rephrase that question.

BY MS. RIGGINS:

Q. Sure. So I think you said earlier, and please correct me if I'm wrong, that you wrote "Gingles not present" on the page was because that's something Representative Hall said; is that right?

A. Yes.

Q. I think you said you disagreed with that?

A. Yes.

Q. Okay. So why did you disagree with that?

MR. GARSON: Objection. Calls for legal conclusion. You may proceed.

THE WITNESS: So as I said, I'm not an expert on the Gingles decision but I believe that there's something about doing the Gingles analysis to establish VRA districts is maybe the logic there and it does -- my

sense was that because this had come up before in previous redistricting that we did have racially polarized voting in certain parts of North Carolina and that we needed to draw VRA districts and VRA districts first. And I'm not sure I answered your question.

BY MS. RIGGINS:

Q. No. I think you kind of did but let me ask a couple of follow-ups. So I think you testified earlier that race was not used in the 2021 redistricting cycle; is that right?

MR. GARSON: Objection. You may proceed.

THE WITNESS: That's my recollection because -- yeah, that's my recollection.

BY MS. RIGGINS:

Q. Is it your recollection that race was not used in the 2019 redistricting cycle?

A. So I did miss one of those committee meetings in 2019 because I was in Mexico, I think, for maybe the first one. So I think I might have missed the first meeting, but I cannot remember the specific discussion regarding race in 2019. I remember it pretty specifically in 2021 and I remember it very specifically in 2023 but I can't

say about 2021.

Q. Okay. Do you know if racial data was used in the drawing of the maps that were passed in 2011?

A. You know, I don't remember that. I actually wasn't on the committee then and I don't remember that.

Q. All right.

A. I mean I will say that I believe that there was a racial gerrymandering decision based on those maps but I don't remember. I don't remember.

Q. Okay. Any other reasons sitting here today that you can recall why you disagree with Representative Hall's statement that the Gingles factors were not present?

A. Why I disagree that the Gingles factors were not present. Okay. So I have a recollection of raising this issue in 2021 because I believe I offered an amendment. And I believe it was House District 10 because I think it was Raymond Smith and John Bell getting drawn together and it was an area that was considered a VRA district. And I remember thinking that -- I mean I didn't understand it a lot then but I got to understand a little bit better for the 2023 redraw.

I did look at the letter that we got from the Southern Coalition for Social Justice, and I did see the correlation between -- the correlation was black and white voting patterns in these districts and the results. I just knew that this was an issue that had come up before and I felt like -- I felt like that we hadn't done the analyses required by one of those Supreme Court decisions. I don't know if it was Gingles but it definitely was upheld in Milligan. The need to do distinct racially polarized voting analyses. And we hadn't done it, so how would we even know if we had racially polarized voting if we hadn't done the analyses? And I think that's why I disagreed because it was a reliance on a statewide conclusion.

I have some recollection there was a Lewis guy who filed an exhibit in one of the cases in 2021 and mentioned that he didn't think his analysis should have been used and I'm not sure we did it. And I remember Chair Hall continuing to say we don't have any racially polarized voting in North Carolina. And I disagreed with the conclusion because I'm not sure we did the proper analyses.

I know I'm mixing up the timeline a little bit because these questions came prior to the receipt of the SCSJ letter. So somewhere in there I was doing the calculus in my head that there was evidence of it based on previous redistricting cases.

Q. All right. I would like to mark as Exhibit 8 a document produced by you. It's Bates labeled Harrison 000137 to 143.

(Exhibit 8 marked for identification.)

THE WITNESS: I recognize it, if that's what you were going to ask me.

BY MS. RIGGINS:

Q. Yes. So it says "From Todd" top right-hand corner, right?

A. Yes.

Q. Is that Todd Barlow?

A. Yes. Although, that's my LA's handwriting.

Q. Okay. And it looks like there are some highlights on this document. Did you make those, Representative Harrison?

A. Yes.

Q. Do you recall when you first saw this document?

A. I can't tell you exactly when we got it but it was in anticipation of committee discussion.

Q. Okay.

A. So it would have been prior to -- my guess is it was prior to October of -- October 19th of 2023, but I don't remember. Prior to October 23rd meeting. I don't think we had this prior to the 19th because it was a pretty short time between receiving the maps and having the 19th meeting. So my guess is it was probably for the committee debate. It could have been the floor debate. So prior to 23 or 24 October.

Q. Okay. So on the first page, Harrison 137 about midway through, do you see a paragraph that starts, "We are almost a year away from the general election"?

A. Yes.

Q. Okay. There's a bullet under that that reads, "Why did you keep these maps in secret for so long." Do you see that?

A. Yes.

Q. Why did you believe that the maps were kept in secret for a long time?

A. That's not my question. That's Todd's suggestion. It's not my style to ask those kind of

questions, so I didn't -- that wasn't anything that's associated with me. I can tell you that we were concerned that -- and I think I mentioned this earlier in this deposition. We were concerned that the maps were getting released too close to filing and too -- we had plenty of time and we knew it was coming and we felt like the leadership could have done it earlier to have more public participation and allow for more -- I don't want to anticipate that every map's going to get challenged legally but it just makes it impossible to challenge it in time to be timely for any kind of remedy prior to filing in the election. So there was some concern that delaying the maps until that late in October was deliberate. But that's not my question and I wouldn't ask it because, like, that's not my style. Too confrontational.

Q. Yeah. Do you believe that the maps were drawn much earlier in the year in 2023 and kept in secret?

A. That I have no idea. I really -- I don't.

Q. Okay. And so the second bolded header on this page, "How Did You Draw These Maps," it looks like you wrote "Zack" next to that header; is that right?

A. Yes.

Q. Who is Zack?

A. Zack Hawkins.

Q. Do you recall why you wrote that there?

A. Yes. Because we were assigning topics to committee members to cover. So, yeah, I don't remember the other -- I mean I know Becky Carney talked a little bit about the transparency in process. So I believe she handled that first part but I didn't write her name down.

Q. Okay. And then on page 138 kind of in the middle of the page --

A. Yeah.

Q. -- it says, "It appears you are drawing ugly, non-compact districts in urban counties in an effort to elect a few Republicans in these strongly Democratic counties." Did I read that phrase correctly?

A. Yes.

Q. Okay. Do you agree with that statement?

A. Do I have to answer that? I guess I do. I mean I don't like to -- I don't like to say that. I wouldn't call -- I don't know. I am not an expert on these maps. I have to rely on others who understand the whole state implications on this.

This was Todd's analysis.

It does look like there was an attempt to make the districts more Republican leaning and it looks like this is how it happened in the urban counties. I do believe that the non-compact is accurate. Although, they didn't use the Polsby-Popper or Reock in the drawing of the maps, so it was a visual thing. I do believe that we have some non-compact districts in an attempt to elect a few. I do agree with that. I might not have used the word "ugly." I think that got my eye. It seems rude to call it that but I would say non-compact.

Q. Okay. Let's turn the page to 139. Do you see a header there that says "Protecting the Rights of Minority Voters"?

A. Yes.

Q. And it looks like you wrote "PH" and "Milligan" after that; is that right?

A. (Witness nods.) I'm sorry. Yes.

Q. Okay. Is that because this section was assigned to you?

A. Yes.

Q. And it looks like you wrote numbers like kind of to create bullets on this page; is that

right?

A. Yes. I'm pretty sure I wanted to make sure I went in the order. I made sure I spoke in a way that was clear and made sure I separated out the points. Yeah.

Q. Okay. It looks on the side to the right, you wrote something after the bullet, "Has a racial polarization study been done to examine racial voting patterns in different parts of the state"; is that right?

A. Yes.

Q. Can you read that? I don't want to guess.

A. Yeah. So it says, "Done in the past. RPV have taken place." And again, I believe I was quoting Chair Hall because I disagreed that they had been done in the past but I think I wrote his answer down.

Q. Okay. All right. And then it looks like for the next -- for pages 140 through 143, it looks like these are all considerations of partisan fairness; is that right?

A. Yes.

Q. Do you recall raising issues of partisan fairness in any committee meeting on the floor in the House?

A. I am fairly certain that I did not because that wasn't what I was focused on. I believe the rest of this information actually ended up being provided to the entire caucus because some of those points were raised by my colleagues who were not on the committee during the floor debate, if I recall correctly. I mean I'm thinking Eric Ager and Deb Butler specifically referenced some of the information in here. But, yeah, this was not part of my assignment. Mine stopped with the VRA, I believe.

Q. Okay. How did you guys decide who was going to discuss what in committee meetings?

A. Generally we -- we met before the committee. I don't know if it was like immediately before the committee or if it was at some point. And in order to be more organized, we had members decide -- I mean I tend to do a lot of the talking and we wanted to make sure folks wanted to cover the areas they were interested in. So I think it was kind of a combination of assignment and input and I'm not -- I don't believe all were at the meeting. I don't believe Mr. Brockman was, which is why he probably didn't have an assignment. Yeah. So that's -- generally it's just kind of a

communal input.

Q. Okay.

A. Involuntary.

Q. I probably should have asked you this earlier but what members of the House Democratic Caucus were also members of the House Redistricting Committee in 2023?

A. So my recollection is the Democrats on the committee were Becky Carney, Cecil Brockman, Abe Jones, Zack Hawkins, Robert Reives and me. I think that's it. I didn't memorize it but that's my recollection.

Q. Okay. I would like to look at another document you produced in this case, which we'll mark as Exhibit 9, and it's Harrison 000116 to 120.

A. I recognize this.

(Exhibit 9 marked for identification.)

BY MS. RIGGINS:

Q. Do you need a minute to flip through? There's four or five pages.

A. I mean, I know it.

Q. Okay.

A. I'll need to flip when you ask something specific.

Q. Okay. So what is this document,

Representative Harrison?

A. So these are my notes from a meeting with -- and I've got Eddie Speas on here and I've got Caroline, Caroline Mackie. I think her name's on here. And I assume Todd was involved in that meeting, and it would be -- it would have been a meeting. I don't know if it was just me or if it was the Democrats on the House Redistricting who were available to attend. It was not a specific VRA discussion.

Q. Okay.

A. So it might have been -- that's why I feel like it might have been me. Typically I don't know a few others because there was a lot of -- yeah, it was almost all VRA discussion.

Q. Okay. So it looks like at the top it says "Redistricting/Eastern NC"; is that right?

A. Uh-huh. I'm sorry. Yes.

Q. So was the topic of the meeting limited to Eastern North Carolina redistricting?

A. I don't -- so that I do not remember. I think it was -- I mean I think there was a strong feeling that the Eastern North Carolina districts were the obvious districts where there were likely VRA violations. And so I don't know if the meeting

was focused on just eastern. It looks like -- on my notes it looks like it's -- yeah, it looks like it was, yeah. I mean I remember the document but I don't remember when that meeting was. I remember having a meeting. I remember Eddie Speas and Todd but it looks like it's also a lot of -- it looks like it's a discussion of the potential for an amendment because I think the amendment I eventually ran had some of this information in it. This is why I don't remember if it was specific to my amendment or in general discussion about VRA issues.

Q. Okay. It looks like -- at the top of the page it looks like you wrote "Two black majority - Wray and Willingham"?

A. Yes.

Q. What did you mean when you wrote that?

A. I believe I meant that we currently had two black majority districts in the current legislature with Michael Wray and Shelly Willingham. We had more before the 2022 election but I believe we lost a few. And Linda Cooper-Suggs and Terry Garrison and Howard Hunter. I don't know if there was another one in there. I think we lost a few. Yeah. I think we lost at

least three, maybe five, African-American legislators in possible VRA districts. So now we're down to two in Eastern North Carolina. Yeah.

Q. Okay. Is it your recollection that in 2022, Representative Garrison ran in a district that was majority black voting age population?

A. That I don't -- I'm not good on that. On the politics of it, I don't like really get involved. Yeah. So he could have but I don't know that. I don't have specific knowledge about that.

Q. Okay. You mentioned -- I think you used the phrase "a VRA district" a minute ago with your response; is that right?

A. Yes.

Q. What did you mean when you said that?

A. I am quoting my much more knowledgeable colleagues, and VRA stands for Voting Rights Act. I assume it means compliance with the Voting Rights Act and I think it means compliance with Section 2 of the Voting Rights Act, which I have not read in a really long time.

Q. Okay. And as a legislator who's sitting on the House Redistricting Committee, not as an attorney --

A. Uh-huh.

Q. -- do you have an understanding of whether the VRA only requires the creation of districts with more than 50 percent black voting age population?

MR. GARSON: Objection to form and objection on the basis it calls for a legal conclusion. You can ask her to restate the question if you don't understand it.

THE WITNESS: Actually, I don't know that for sure. I don't know that for sure.

BY MS. RIGGINS:

Q. So as a legislator sitting on the House Redistricting Committee, not as a lawyer, do you think the General Assembly can be compelled under the Voting Rights Act to draw a district for VRA compliance that does not or that has less than 50 percent black voting age?

MR. GARSON: Same objections as before. If you understand the question, you can answer it.

THE WITNESS: I have some recollection that, yes, because they can elect the legislative -- they're able to elect a candidate of their choice and not be blocked by the majority population. I think that

there are VRA districts that can elect non African-American, but I should say that I don't know that for sure.

BY MS. RIGGINS:

Q. Okay. And it looks like under 2 you wrote something like (b) helps litigation; is that right?

A. Oh, yeah. Right. I was looking at the wrong part. Yes.

Q. And is that under a bullet that says, "Fight for more black districts - AA"?

A. Yes.

Q. Do you recall what you meant when you wrote these things?

A. You know, I don't remember. Obviously AA is African-American. I know that there was some concern that we had lost so many African-Americans in the election in this just past election but I don't remember what the "helps litigation" bit is. I don't. I'm sorry.

Q. Okay. Other than Eddie Speas and Caroline Mackie and yourself, do you recall who was present for this meeting where you took these notes?

A. I don't remember who else was in this meeting and I obviously wrote somebody named Steven down here. So I'm not sure. I say I don't

remember. I think there is a Steven Mallickson. I think that might be his name but I don't really know him and I think he might draw maps. He might have been there but I'm not sure. I don't know if that's who that was.

Q. Okay. Who is Steven Mallickson?

A. As I said, I don't really know who he is. I think he has maybe drawn a map before for somebody. So I think I'm repeating myself but I don't draw maps. I don't really know how to draw maps and I don't really get involved much in the process of drawing maps, so I don't really know these people. But I think he's a person whose name I have heard before who has helped draw maps. And I don't know if he's helped draw them for the party or the caucus or some other advocacy group. I've heard his name before. I think I remember him being in meetings before during the 2021 redraw, but I don't -- and I may have met him but this is where my memory is faulty. Sorry.

Q. Okay. Do you have any understanding of where he might be employed?

A. That I don't know but I think he's in the area. I think he's in the Triangle. I think he is but I'm not sure.

Q. Okay. And so we'll skip to the bottom of the page because I see you noted, "Steven: 3 new VRA black + one more - Terry Garrison." Do you see that?

A. I do.

Q. Do you recall like what this section of the document means?

A. I don't. I would be guessing, I think, if I answered. It may be that he thinks there's a way to draw a map that has more VRA districts in it. Or it could be a reference to the black districts we've lost, but I wrote down all these numbers down here for numbers of -- district numbers. But, you know, I really -- I mean I recognize the document but I don't remember the meeting. I mean I don't remember the specific meeting and I don't remember that piece of Steven's involvement. So I'm guessing this was a Zoom call and not in person because I would remember it better if I were seeing people's faces.

Q. Uh-huh.

A. So I'm looking at the district numbers down there. 12, 24, 27, those. So if you're going to ask me what those numbers are, I'm getting -- I don't know if that's BVAP or I don't even remember

what that is or if that's -- yeah, I don't know. Or it could be like, you know, 51 percent voted for Cherie Beasley. I don't know. I don't know what those numbers -- what I wrote down.

Q. Okay. And you see off to the left side in this bottom left corner, it says Steven's map. Lots of county splits," I think? Is that what it says?

A. Uh-huh.

Q. Okay. Did you look at a map drawn by Steven on this Zoom call?

A. And I'm sorry. I really don't remember. I'm pretty sure it was by Zoom. I do my Zoom calls on a phone. So I could have looked at a map but I'm not sure I -- the districts don't mean anything to me and it's a tiny screen. So there could have been but I don't remember.

Q. Sure. You said this meeting was on Zoom. Do you think it's one of the meetings with one of the two calendar entries we looked at earlier?

A. That would be speculation. I normally write a date down to help with my recollection but I am just not having a specific recollection of when this was. It would have had to have been obviously after -- I mean I think it would --

actually, I'm not going to say obviously. I don't know when this was. I don't know how far in advance of October 18th it was or -- I mean 19th. Or if it was like in advance of the 23rd when we at that point had seen the Republican offer. So I'm not sure.

Q. Okay. And then it looks like in sort of the section that's in the middle of this page here, it says "Todd's - 3 new VRA black maj districts"; is that right?

A. Yes.

Q. Is Todd, Todd Barlow?

A. That is.

Q. So had Todd Barlow drawn additional VRA districts that you were discussing here?

A. That's my recollection. And it might be -- if I had a better memory of my amendment, it might have been in anticipation of possibly running an amendment to these. Because I do recall my amendment added three -- proposed adding three new VRA districts.

Q. And it looks like you have bullets underneath there. It says, "12 Goldsboro/Kinston BVAP 50.9%/total pop 50.14%"; is that right?

A. Yes, that's right. Annette Humphrey.

That's who that is. Okay, Kinston. Okay, yes.

Q. All right. And so is it your understanding that there was a majority black district being proposed in the Goldsboro Kinston area with a black voting age population of 50.9 percent here?

A. That was my -- that's what my note says. I don't have a specific recollection about those specific numbers but I do know we were trying to figure out -- I do recall we were trying to figure out if there was a way to draw more VRA districts because that was a subject of big concern in our caucus, especially after we lost all those in 2022. I don't honestly know why -- what that means. BVAP 50.9 and total population of what? I don't know what that means.

Q. Okay. And then it looks like another district was contemplated in Wilson/Rocky Mount area?

A. Right.

Q. And that would have 50.6 percent BVAP?

A. Yes.

Q. And it looks like there's another one that says, "S Willingham and Wray share/Bill Ward seat"; is that right?

A. So I think that -- is that number 5 and maybe not S? I don't know.

Q. Oh, maybe.

A. So I don't know all those district numbers either but I -- which is why I had to write down the members of them now so that I would be able to figure it out. Okay, right. So same. So it's "same." "Willingham and Wray same." I don't know why it says, "same/Bill Ward seat." So I believe that would be -- I believe that's Howard Hunter and I think Willingham loses Bertie. So I think at that point we were looking at his amendment because the amendment proposes -- one of the two amendments that I offered proposed changing, and maybe both of them did propose changing Willingham's district a bit. But I don't know. No. 5, I don't know if that's his number or not. And, yeah, loses Bertie and picks up Tyrrell and Washington and changed them to Willingham. And, as it says, there would be three new county splits.

Q. Okay. So you talked about an amendment.

A. Uh-huh.

Q. I'm going to show you Amendment HBA-3, Amendment A1 that was introduced by you on the House floor. And we'll mark this as Exhibit 10.

(Exhibit 10 marked for identification.)

THE WITNESS: Yeah. So a lot smaller.

BY MS. RIGGINS:

Q. I know. Sorry. This is the way it came off the website. You see in the bottom "10/23/2023 at 6:20 p.m."?

A. I do see that.

Q. Okay. Does this look familiar to you?

A. I mean I don't know that I would actually recognize the picture of my amendment but I know I offered two. And I know that -- I mean I know I offered it. And if you're telling me this is the one I offered, I appreciate that that is the map. I'm not going to recognize it from the shapefiles.

MS. RIGGINS: This can be Exhibit 11.

(Exhibit 11 marked for identification.)

BY MS. RIGGINS:

Q. So this is a copy of amendment A1 from the General Assembly's website and indicates it was offered by you.

A. All right, fine. I trust you. I trust this is what -- I just don't memorize what my amendments look like. It's easier when I see the language. But, okay, I will agree that this is what I offered, the first of two.

Q. Thank you, yes.

A. Because I don't know that I would recognize them from looking at them.

Q. And if you turn to the very last page in Exhibit 11, is that the same map that was Exhibit 10?

A. I mean I assume it is. You know, there's a lot of districts. I mean I assume it is.

Q. Yes. This has "HBA-3 Amend" at the top.

A. Oh, yes. Sorry.

Q. And then at the bottom it's got the same time as --

A. Yes. Thank you.

Q. So you offered the amendment in Exhibit 11 which would move the precincts. Does it refresh your recollection now, Representative Harrison, that Exhibit 10 is a map version of the amendment you offered in HBA-3?

A. Yes.

Q. And to the best of your recollection, is this the amendment you were discussing here on Harrison 116? And you can also feel free to look at Exhibit 11 which has the breakdowns of the counties.

A. Yes. So that doesn't help me. I can't

read these, I am embarrassed to admit. I defer to the experts. I think it would be easier on me if like I had my notes where I talked about the districts and I know I've got them. This is in the creation of it but I don't have my notes specific to this one. I know I offered two. Actually, I had three. One I withdrew. The specific districts, I remember talking about them but I don't like have a list in front of me to remember which ones.

Q. Okay. Is it your recollection that you took notes onto the House floor when you offered this amendment?

A. I don't -- so I think there was something in my document production, I believe, unless it's in -- because I asked my -- my LA and I went through everything we had to make sure we produced everything because that was not an off-the-cuff -- that was not an off-the-cuff presentation of that amendment.

Q. I'll tell you what Representative Harrison, I will keep my promise not to play you any audio. But I have two pages that have been transcribed. Would that help you?

A. Yes.

Q. When you were talking about this amendment.

A. Yeah. That would be great. Thank you.

Q. All right.

A. And I know -- I was going to offer this in committee and then I declined to offer it in committee because I didn't want to offer it in committee and on the floor.

(Exhibit 12 marked for identification.)

THE WITNESS: I remember very good coherent, cogent discussion of my amendment in the floor debate. That would be great. Thank you.

BY MS. RIGGINS:

Q. So this is a copy of the House session that was transcribed on October 24, 2023.

A. Okay.

Q. So I'll represent to you, Representative Harrison, so you don't have the read the big long document, that the discussion here is on page 32.

A. Okay.

Q. Sorry. You begin speaking on page 30.

A. Uh-huh.

Q. And then the amendment discussion starts on page 32. If you want to read that through 35 or

through 36, I think it might help you.

MR. GARSON: Take your time.

(Brief pause.)

BY MS. RIGGINS:

Q. So I would like to ask you some questions about what you said on page 36 of this transcript?

A. Uh-huh.

Q. It looks like on line 13, you said, "The amendment before you creates three additional VRA districts: House District 24 in Wilson and Nash; House District 5 in Bertie, Hertford, Gates and Pasquotank Counties; and then House District 12 in Wayne, Lenoir and Greene counties." Did I read that correctly?

A. Yes.

Q. Okay. And so does that help refresh your recollection that these are the districts you were talking about that Todd Barlow drew in this meeting or they were discussing in this meeting?

A. Yes.

Q. And it also says or looks like you said House District 23 would remove Bertie County and replace it with Washington and Tyrell County is that right?

A. They'll get mad if you call it that.

Tyrell.

Q. Tyrell?

A. Yeah. Sorry. They have a thing about that.

Q. Everybody's got a thing about the way they say some of these counties.

All right. So is it your recollection also that the amendment also reverted the rest of the state to the 2022 map?

A. That's my recollection. I do remember that.

Q. Okay. And I think you said earlier that you chose not to offer this in committee; is that right?

A. Yes.

Q. And why did you choose not to do that?

A. Well, a couple of reasons. Probably one, not to be annoying because it would -- we would be doing the same thing twice once I did it on the floor. And when you do it on the floor, there's more opportunity for people who are watching in the public and also to create a record. But, yeah, I think I just felt like it would have been -- I often do that in other areas that I work on to not -- there's a strategy about whether to do it.

If you think it's going to pass, it's always good to try and do it in committee. I was pretty sure this was not going to pass and I didn't want to have to put the committee through that twice because they would have had to do it on the floor, too. And I believe I said that in the committee on the 23rd that I was going to offer it on the floor instead.

Q. Okay. Do you have any understanding of how Todd Barlow drew amendment A1 or HBA-3, depending on how you want to call it?

A. I have no idea. I know he knows the state and he knows the maps and he knows the precincts. I don't know where or how he drew it. It was presented to me.

Q. Do you know if he used racial data to draw that district or those districts?

A. I don't know that except that he mentioned the BVAP population. So I don't know how you get those without the racial data.

Q. Okay. And then I believe you also offered another amendment; is that right?

A. That's right.

Q. Okay. Go ahead.

A. Well, I was just going to say my

recollection is the reason why was maybe it split. I think it was -- I should review this before I say that. My recollection was it had something to do with maybe trading off splitting counties versus precincts or something but I might need to look at the transcript.

Q. I can help you. Can you turn to page 51?

A. Okay. Thank you. Save me some reading. And I do also remember that I accidentally offered my Guilford County amendment and made this argument and then I said that was a mistake, just apply the points I made in the Guilford County amendment to the second amendment that I was offering. So there was a little bit of a mix-up there because my laptop wasn't working and I couldn't see which amendment I was offering.

Q. Okay.

A. It splits one VTD in Lenoir and keeps Greene County whole. That's the difference between the two map offers.

Q. Okay. Perfect. So we can put the exhibits regarding the amendments aside.

A. I guess I keep these handy?

Q. Yes. Can we turn back to Exhibit 9?

A. Yeah.

Q. All right. So on page 117 of Exhibit 9, looks like you wrote "Eddie Speas" colon?

A. Yes.

Q. Are these your notes based on what you recall Mr. Speas saying in this meeting?

A. That would be my recollection, yes.

Q. Okay. And then on the next page.

A. 118?

Q. Yes, 118. Sort of in the middle of the page it looks like it says "Steven's map affects Wray and Willingham."

A. Yes. I see that.

Q. Okay. Can you read what you said after that? I don't want to misconstrue what you said. I'm sorry. When people ask me --

A. I don't know. "Affects Wray and Willingham - NCGA use in" -- defense maybe is what I said. I don't know if that's defense. "Not a racial voice speaking - a political voice speaking." The NCGA -- yeah. I don't remember that point. I think it's either defense or define NCGA use in -- "not a racial voice speaking." Oh, that maybe the legislature would defend it by saying it's a political voice speaking, not a racial voice speaking. I think that's what I was

writing down. I think that's the point I was making, that they would anticipate that the leadership would defend it by saying it's not racial; it's political.

Q. Okay. Do you recall that Steven's map would have affected Wray and Willingham?

A. I don't. I don't even remember Steven's map.

Q. Okay. I'm asking you about something that happened a year ago. I mean you're doing great.

A. I can remember 10 years ago but I can't remember last October.

Q. All right. Can we turn to page Harrison 120?

A. Yes. Very legible.

Q. It looks like it says "Caroline 4" in the top right corner.

A. So I numbered the pages, yes, but that was not No. 4. It's page 5.

Q. Looks likes --

A. I mixed up 4 and 5.

Q. I see. That makes more sense.

A. So the last page is before page 4. Yeah. So I was numbering the pages because I've written these on the back of calendars that are one-sided

which is what I use for scrap paper. I wanted to make sure I kept it in the right order. Caroline, I assume, was Caroline Mackie.

Q. Okay. And it looks like kind of below it says, "Strategy here? Argue (Stephenson 1)"; is that right?

A. Yes. Strategy, but I don't know what after strategy offers. "Argue (Stephenson 1)" But I'm not -- that's another thing. The Stephenson cases are also kind of confusing. But since Stephenson was a VRA district, draw them first. So I think that's what that means.

If you were going to ask me about the next line -- were you thinking about asking me about the next line or no?

Q. The next line that says, "None in urban - no Section 2 in urban areas"?

A. Yeah.

Q. Did I read that correctly?

A. Yeah, you did. And this is -- I was trying to remember. I remember that discussion because there was some talk about whether we had some VRA districts even in Greensboro. I remember that coming up, and I don't know that they were concluding that but that they were going to try and

do that. They were not going to maybe try and do that with the urban areas because maybe the case was a little harder to make than the VRA districts in Eastern North Carolina. I don't think they concluded that there weren't any but that the amendment didn't have any proposed for urban areas.

Q. Okay.

A. If you were going to ask me. I should have let you ask me that without offering it. I'm not a good witness with my lawyer here.

Q. That's fine. You can probably actually see my notes across the table.

All right. So kind of down and to the left of that, I think it says BVAP --

A. That's hashtag.

Q. Yeah, hashtag.

A. BVAP numbers is what --

Q. BVAP numbers. Thank you. Dash "Milligan 50%." Do you see that?

A. I do.

Q. Do you remember what you meant when you wrote that?

A. I don't. Nor do I recall why Craven is underlined either because I know that that's been an issue over there in Craven, black voting

population in Craven. So I don't know why.

Q. And then underneath it looks likes you wrote something about an RPV analysis; is that right?

A. I did write that down.

Q. And does this say--and please correct me if I'm not reading your handwriting correctly-- "Would be helpful - not required" --

A. At the NCGA level.

Q. "At NCGA level. Not necessary" --

A. Right now.

Q. -- "right now." Okay. Do you recall why you wrote that?

A. I don't. I'm sorry.

Q. And then it says, "No Cumberland 50%"; is that right?

A. Yes. And that's not an underline. That's a mark through. Do you see?

Q. Okay. Yes, I do.

A. So I don't know why I marked through that. "Attorney-client privilege" was written down right below that. I don't know what that was either. And maybe it was because I thought that Caroline and Eddie represented Todd Barlow -- represents our caucus. And there was some thought that there

might be attorney-client privilege involved.

Q. Are you aware that Mr. Speas and Ms. Mackie represent plaintiffs in another redistricting lawsuit that you were not subpoenaed in?

A. Oh. No, I was not.

Q. Okay. Is it possible --

A. Oh, you mean they represent Dan Blue and Robert Reives?

Q. No. They represent Mr. Pierce and Mr. Matthews.

A. Oh, no. I haven't been able to keep track. It's confusing to me. There's so many.

Q. Is it possible that that 50 percent number represents the amount of black voting age population needed under the Milligan case for a VRA district?

MR. GARSON: Objection.

MS. BECH: Objection.

THE WITNESS: You said is it possible --

BY MS. RIGGINS:

Q. That that's what your notes were reflecting.

A. I don't remember. I'm sorry. I don't remember.

Q. I skipped ahead. All right. So I think we're done with this exhibit. Let's look at a document that I'm going to mark as Exhibit 13, which is Harrison 103.

(Exhibit 13 marked for identification.)

THE WITNESS: Yeah. I recognize it.

BY MS. RIGGINS:

Q. Is this an e-mail from Ms. Klein to you dated October 24th, 2023?

A. Yes.

Q. Okay. And did you make notes and highlights on this e-mail?

A. Yes.

Q. Okay. And it looks like there was an attachment to this e-mail; is that right?

A. Yes. I don't know why that's not with it. I don't know where the attachment is. I guess I didn't produce it. Did I not produce it?

Q. Do you recall if you printed it out and put notes on that, too?

A. You know, I don't. Because I believe that Ms. Klein captured the salient points there but I probably read through it. So I can -- we can check our e-mail. I think we produced every hard copy of anything that I had, including multiple copies of

some things. But I can get the attachment to you if that helps.

Q. That's okay. The brief was publicly filed, so I have a copy of it.

A. Okay. I doubt I made any notes on it because I had a lot of paperwork at that meeting. I mean at the committee meeting. And I didn't need any more.

Q. Okay. So for the committee meeting, did you rely on the bullets that Ms. Klein provided you in this email?

A. Yes.

Q. Okay. And I think you had mentioned someone named Lewis earlier. Is that Dr. Lewis?

A. Yes.

Q. Okay. Did you ever review any of Dr. Lewis' reports in the Harper v. Hall case?

A. Would that have been what was attached to this?

Q. Well, that was their brief.

A. Right.

Q. But she's referencing Dr. Lewis characterized his own analysis. So did you ever look at Dr. Lewis' analysis in this case?

A. Oh, right. I don't remember. I don't

remember. I try and look at everything that I think is relevant. I may have just looked at the brief report. I mean the brief discussion of his report and maybe not his report. I can't remember. I'm sorry.

Q. Okay. Are you aware that Dr. Lewis analyzed 420 election contests in that analysis?

A. I am not aware of that.

Q. And are you aware that Dr. Lewis' analysis contained specific analysis of every House, Senate and congressional district in the 2022 election in the proposed 2021 redistricting plan?

A. I am not aware of that.

Q. Okay. Did you review any -- well, let me ask you this. The second bullet in this e-mail, it says, "Dr. Lewis did not make any findings as to whether there exists legally-significant racially polarized voting in North Carolina or any specific region." Do you see that?

A. I do see that.

Q. Do you have an understanding of what legally significant racially polarized voting is?

MR. GARSON: Objection. You may answer.

THE WITNESS: Thanks. I believe I understand that conceptually. And the points

that I believe Leader Rieves made specifically on the floor -- and I can't remember if I said them in association with my offer of my amendment in terms of the correlation between black -- I remember like in the Trump race and the Cherie Beasley race, the correlation between African-American voting for Cherie Beasley v. Trump and vice versa. So I sort of get that.

I mean I think that's what Gingles was about, whether you're allowed to elect the candidate of your choice and that you don't have a block that can keep that from happening. So that's sort of my very elementary understanding.

BY MS. RIGGINS:

Q. All Right. And then the next sentence there it says, "He admitted this under oath (see citation at page 27)." Do you see that?

A. Yes.

Q. Did you review the citation to Dr. Lewis' deposition that was in this brief?

A. I hope I did but I don't have a specific recollection.

Q. Are you aware that Dr. Lewis' deposition

was publicly filed several times in several different places?

A. No. I'm not aware of that. Yeah.

Q. Okay. Would you like to see a copy of what he actually said?

MR. GARSON: Objection.

THE WITNESS: I wouldn't mind seeing it but are you going to quiz me on it?

BY MS. RIGGINS:

Q. No. I'm just asking you because what he said is slightly different than what's represented to you.

A. Okay.

Q. So I just wanted to make sure you knew that.

A. I appreciate that. I obviously trust the source.

MS. RIGGINS: We'll mark this as Exhibit 14.

(Exhibit 14 marked for identification.)

THE WITNESS: Our job is part time and this was all sort of volunteer research in preparation.

BY MS. RIGGINS:

Q. The numbers at the very top of the page,

these are record on appeal numbers. So this was publicly filed with the North Carolina Supreme Court. So there's a question asked on the second page of this exhibit at line 21. Do you see that?

A. Uh-huh.

Q. All right. And then the answer by Dr. Lewis is on the next page. And do you see what he testified to at lines 12 through 15 is, "So I don't have an opinion about, you know, what constitutes a level of racially polarized voting that would require some sort of action"?

A. I see that he said that.

Q. And do you see at the top he qualified his answer at lines 2 through 3 that "I don't profess to be an expert on the law"?

A. I do see that he said that. So I think that if I remember correctly, that Chair Hall had said there have been plenty of racially polarized voting analyses done in North Carolina and they didn't do one specifically and that they concluded that there was no racially polarized voting. And I thought he had referenced specifically Dr. Lewis'. Yeah. So anyway, I think that's what I was trying to make the point. Thank you.

Q. And so you might have said this earlier.

Did you ever see a copy of Dr. Lewis' report that Representative Hall referenced in the meeting?

A. I don't know that I did.

Q. So this is a lot of exhibit stickers on it. It's a well used document. We'll mark this as Exhibit 15.

(Exhibit 15 marked for identification.)

BY MS. RIGGINS:

Q. So this is the expert report of Dr. Jeff Lewis from the NCLCV/Harper v. Hall consolidated cases.

A. Uh-huh.

Q. And if you look at numbered page 5 of the document -- the number's in the bottom center. Do you see at the very bottom there is a paragraph No. 16?

A. Yes.

Q. Okay. And it says, "This analysis goes beyond Professor Dunchin's analysis to consider not just 4 primary and 4 general contests, but over 420 individual contests including over 190 that include a black candidate." Do you see that?

A. I do.

Q. All right. Do you consider an analysis that looks at 420 individual election contests to

be abbreviated?

MR. GARSON: Objection. Calls for legal conclusion.

MS. RIGGINS: I don't think so. I'm asking if she considers an election -- like an analysis that looks at 420 election contests. This isn't a legal analysis.

MR. GARSON: To the extent that abbreviation has a contextual legal meaning, I make the objection.

THE WITNESS: To be honest, I don't feel qualified to answer that. I'm sorry. I'm not being obstinate. I just don't feel qualified to opine on this.

BY MS. RIGGINS:

Q. Okay. But you made Ms. Klein's points on the record in this case; is that right?

A. I did.

Q. And you didn't do any independent verification by looking at Dr. Lewis' report or his deposition testimony before you made those points, did you?

MR. GARSON: Objection to form.

THE WITNESS: I don't remember looking at anything that he had produced. I must

have looked at what was attached from -- that was in the common causes brief. But I don't believe that I looked at anything specifically that he had produced.

BY MS. RIGGINS:

Q. So have you ever seen Exhibit 15 before, Representative Harrison?

A. Is this 15?

Q. Yes.

A. Well, maybe. I don't know. I don't think I have. I don't recognize it, but I -- I don't recognize it, but that's not to say I haven't seen it before.

Q. Do you recall analyzing this report or any of Dr. Lewis' other work in the Harper case in October of 2023?

A. I had some recollection that there was some chance that I might be called as a witness in that case. But if I recall correctly, it was also on a very short time frame. And I believe Zack Hawkins was the only one of my colleagues who testified and I did do a lot of preparation in case I were called, but I don't remember if it involved this. So I'm sorry. I don't remember specifically.

Q. Sure. Do you remember looking at Dr. Lewis' reports in October of last year in preparation for the 2023 redistricting cycle?

A. I don't remember.

Q. Okay.

A. Lot of pages left.

Q. No. These are all the pages that you produced.

A. I'm looking at that and that looks like we're not halfway through.

Q. Oh, no. We jumped ahead.

A. Okay.

Q. I've got maybe 20 minutes and then I'll probably be done and we can take a lunch break. But if anyone's starving now, I'm happy to break now.

A. I'm fine to let you plow on through.

Q. Okay. I will be done in short order.

A. Keep this out?

Q. No.

Exhibit 16 we talked about earlier and that's Harrison 121 to 125.

(Exhibit 16 marked for identification.)

BY MS. RIGGINS:

Q. Do you know what the document is,

Representative Harrison?

A. This is the letter that the -- yeah. I mean, yes, I do.

Q. Okay. What is this document?

A. So it's a letter that SCSJ, Southern Coalition for Social Justice, sent to the House and Senate leadership about their thought that there was racially polarized voting in North Carolina and how it would affect redistricting.

Q. Okay.

A. I thought it came attached to -- that stuff attached to it.

Q. Yes. It just got produced out of number but I'll mark it as Exhibit 17 -- I'm sorry. Wait. I forgot to have her mark it. Exhibit 17.

(Exhibit 17 marked for identification.)

BY MS. RIGGINS:

Q. So you wrote at the top of the actual letter, "Not House map"?

A. Right.

Q. Why did you write that?

A. I don't know why I wrote it but I know what it means and that's because they were very clear that they didn't have time to do both House and Senate. So they only -- so this particular

letter and analysis focused on proposed Senate districts. SCSJ concluded it would violate the VRA but they also were very clear that this didn't mean there wasn't any in the House.

Q. Okay. Did you receive a similar letter about the House?

A. Well, no, because I believe they said they didn't have time to analyze the House. So it was only a couple of days after the map came out before we were voting on them. So this came out on Sunday night and the maps came out like the 19th. So three days later. I think they were very clear that they didn't have time to do -- this shouldn't be considered there was no racial polarized voting in the House because they didn't have time to do the House, analyze the House map.

Q. Okay.

A. It's my recollection. I think it's in here somewhere stating that. So the answer is a very long answer. No letter specific to the House and they gave a reason, yeah.

Q. Okay. I would like to ask you a question about what was Appendix B to this letter that we have now marked as Exhibit 17.

A. Uh-huh.

Q. So on page 2 of Appendix B, it looks like you highlighted some things in purple.

A. Yes. Why? Is that your question?

Q. Yes. Why did you -- do you recall why you made these highlights?

A. So it would be Districts 5 and 12. Like Hertford and Lenoir, Districts 5 and 12. I don't really know why I picked those two counties and I don't know if it was -- and I may have -- and I didn't really listen to my floor debate. So maybe I cited this specifically during the floor debate when I was offering the amendment but I'm not sure why I highlighted those two. Yeah.

Q. Okay. Do you have any understanding -- well go back to the first page. I don't want to confuse you. So it looks like the table in Appendix B begins on the first page of Exhibit B, right?

A. Yes.

Q. Okay. And so it looks like there are -- you know, you've got the county in the far left column and then BVAP in the column next to that; is that right?

A. Yes.

Q. And you understand BVAP to mean black

voting age population; is that right?

A. I do.

Q. Okay. And then you've got, it looks like, the race of the voting person that's produced in the final right three columns. Do you see that?

A. Yeah.

Q. Okay. So, for example, in Bertie County, you know, I would say that 94.3 percent of black voting age population voted for Beasley?

A. Beasley, yes.

Q. Okay. I just wanted to make sure.

A. Sure.

Q. Because the headers don't go to the next page.

A. Okay.

Q. All right. So let's look, for example, at Greene County which is the first column.

A. Yeah.

Q. Does it look here to the best of what you understand this exhibit to mean that 24.5 percent of the white voters in Greene County voted for Cherie Beasley?

A. Yes.

Q. Okay. And for the first on the first page looking at Gates County it would be 26 percent of

the white voting age population voted for Cherie Beasley; is that right?

A. Yes.

Q. Is Ms. Beasley African-American?

A. Yes.

Q. And is she a Democrat?

A. Yes.

Q. We can put this aside. I know that you indicated earlier that you did not offer any amendments in the House Redistricting Committee sessions; is that right?

A. Yes.

Q. Do you recall that Representatives Reives, Hawkins and Carney offered amendments in those meetings?

A. Yeah. I have a recollection. I think they were amendments that had been agreed upon with the leadership and I think Carney's was just changing numbers in Mecklenburg County to move her back to the old numbers. Did you say Zack Hawkins?

Q. Yes.

A. Yeah. I think he offered one to fix Robert Reives' district, and then I think Roberts had something to do with Wake County and everybody agreed to it. So those are three quick amendments

everybody agreed to in advance. So are you getting at why I wouldn't offer mine when they offered theirs?

Q. No.

A. I'm not good at this.

Q. It's kind of a good question but you answered earlier you thought it wouldn't pass. I accepted that answer. I think you said Zack Hawkins offered an amendment to fix Robert Reives' district. Is it your recollection that the amendment that Representative Hawkins offered changed Representative Reives' district back to the 2022 version he had run under?

A. I mean I couldn't remember the specifics of it but I knew that that was a district that had gotten fixed in 2021 with agreement, redraw. I didn't remember the specifics of it. I just sort of remember that everybody agreed to it.

Q. Okay. Do you remember anything about Representative Reives' Wake County district amendment?

A. So I had some recollection it had something to do with Joe Johns' precincts but I don't remember the details of it. But I think I remember him saying that everybody had agreed to

it. I think -- I don't know if it was on the floor or also in committee where Chair Hall -- actually, since he was offering the map then he didn't -- maybe it was the same. But anyway, he mentioned that -- to see if any racial data was used in the amendment. But I can't remember if he did that in committee or just on the floor. But it seemed like everybody was agreeing to everything.

Q. Okay.

A. The details of it, I was -- I think I was focused on what I was supposed to talk about and I knew that was taken care of. So I probably didn't pay as much attention as I should have.

Q. And so is it your recollection that the amendment offered by Representative Reives, Carney and Hawkins were adopted in committee?

A. That's my recollection.

Q. Okay. Real quick just two more things. I would like to show you what's Bates labeled as Harrison 00087 and we'll mark this as Exhibit 18.

(Exhibit 18 marked for identification.)

BY MS. RIGGINS:

Q. Do you see in the bottom -- well, do you see in the bottom right-hand corner of this map it says "SB 757, 2nd Edition Guilford County"?

A. Yes.

Q. I'll represent to you that Senate Bill 757 is the congressional plan that was passed in 2023.

A. Yeah.

Q. It looks like you made some highlights.

A. Yes, it does.

Q. Do you recall why you made these highlights?

A. So I saw that back in my document production and my thinking is that I was trying to figure out how many House districts were split up among how many congressional districts is what I was doing there. And so, yeah, I circled my district and all my colleagues' districts. I think that's what that is. Because I think I made the point during the floor debate on congressional redistricting that some of the districts were now in -- some House districts now had three congressional districts. Some had two. That's what that was because I was trying to remember myself.

Q. Okay. I would like to show you one more document. If we could mark this as Exhibit 19, and it's Harrison 304.

MS. BECH: I'm sorry. Could you repeat

that, Alyssa?

MS. RIGGINS: Yes. 304 to 307.

(Exhibit 19 marked for identification.)

BY MS. RIGGINS:

Q. Do these appear to be text messages between you and former Justice Bob Orr?

A. Yes.

Q. How do you know former Justice Bob Orr?

A. I just interacted with him over the years on issues and been on panels with him and just general same world of politics.

Q. And it looks like there are several screenshots across these pages all in blue blocks; is that right?

A. Yes.

Q. Do you recall if former Justice Orr responded to your text message?

A. I sent you what I had. I actually don't know if he's much of a text reader but, I mean, I remember the conversation. I remember what this was about and I don't remember getting -- it may have been he called me to talk about it after he received this. But I didn't -- if he responded by text and I didn't -- I didn't include it because he did not respond by text.

Q. Okay.

A. And I can even check my phone right now and double-check.

Q. And it looks like in these text messages, you're sending him some names for Common Cause; is that right?

A. Yeah. Well, it wasn't specific to Common Cause but there are some names in there that references Common Cause, I think, yeah. Do you want to know what this is about?

Q. Yes, please.

A. Okay. So this was prior to him filing his lawsuit on free elections. I think it was free elections clause of the constitution challenging the redistricting based on free elections, and I think the Superior Court ruled against him. I don't think it's advanced since. But I think he was looking for constituents in the affected districts. He thought I might know specific -- especially specific to Greensboro. So I was just trying to help him with some names and that's what this is. And I may have contacted Bob Phillips because I represent -- I did reference Common Cause and I think I may have asked him about some specific plaintiffs that they had used in their

lawsuit, whether they had been vetted and might be interested. So that's what all this discussion is about is about that challenge to redistricting based on free elections.

Q. Okay.

A. Nothing to do with any of these lawsuits.

Q. Okay.

A. And I think I was focused on Guilford County, which is why he contacted me.

Q. So it looks like on Harrison 305 in the top screenshot, you reference Buddy Wester at Robinson Bradshaw?

A. Yes.

Q. Do you know Mr. Wester?

A. I don't. I've heard his name but I don't know him.

Q. Did you speak with him about redistricting in 2023?

A. Buddy Wester?

Q. Yes.

A. No. I've never talked to him that I can remember.

Q. All right. And then it looks like on Harrison 306, the next page, you send another message to former Justice Orr on January 3rd. Do

you see that?

A. I do.

Q. Do you see in the middle of that it says, "Hi Pricey - A few ideas for potential plaintiffs in Guilford," and the list?

A. Yes. I had copied and pasted. Yeah.

Q. Do you recall who you copied and pasted this information from?

A. I think I may have gotten it from our party because I think I contacted our party chair, Guilford County party chair. But I actually can't remember who it was that sent me those names.

Q. Okay.

A. Because I know all these people and I would have suggested them myself. And it may be and I thought I had already -- yeah, I had already recommended Nicole Quick in an earlier text. So I'm not sure where that came from.

Q. Okay. Then if you look at the last page in Exhibit 307, do you see it says, "Tyler spoke to Martha previously"?

A. Yes.

Q. Who is Tyler?

A. Tyler lives in Greensboro and I think he might be employed by Common Cause. So I think his

last name is Daye.

Q. Yeah, D-a-y-e-s. Does that ring a bell?

A. Yeah. That's who that Tyler is.

Q. Okay. And do you know who Martha is?

A. Martha Shafer, who is referenced above.

MS. RIGGINS: Okay. So I think I'm done. How does a lunch break sound while I just go through my notes? And then if I have any clean-up questions, I can ask them very briefly after lunch and then I can turn it to you. Does that work, Mady?

MS. BECH: That sounds great.

MS. RIGGINS: Okay. Is 30 minutes okay for everybody?

MS. BECH: Sure.

MS. RIGGINS: So we'll go off the record.

(Lunch recess.)

MS. RIGGINS: I've got one, maybe two more questions and then I'll turn it over to you, Mady.

BY MS. RIGGINS:

Q. So, Representative Harrison, in one of the exhibits we looked at earlier, you had written some notes about a map drawn by a man named Steven.

A. Yes.
Q. Do you recall his last name?
A. I think I said it might be Mallickson.
Q. Do you have any idea how to spell that?
A. I think it may be M-a-l-l-i-c-k-s-o-n maybe.
Q. Okay.
A. As I said, I think that might be who he is because I have some recollection from earlier redraw redistricting that he had drawn maps and that he was a map drawer but I don't know if that was a Steven.
Q. Do you know how to contact Mr. Mallickson?
A. I can find out. I mean I can't tell you right now. Maybe I wrote him in my phone.
Q. If you want to look on your phone, I don't have an objection to that.
A. If I have it on my phone, I didn't spell it right. Yeah, I don't. I don't have a personal relationship with him and I think I met him during, I think, the 2021 draw. It may have been earlier and so I don't -- I don't know if that's the Steven but I'm guessing, because I think he's a map drawer.
Q. Okay. It wouldn't be Steven Epstein would

it?

A. Oh, well, maybe it was. I don't know.

Q. Would Todd Barlow know who it is?

A. Yeah. Because he was in that meeting.

Q. Would Eddie Speas or Caroline Mackie know who it was also?

A. Yes.

Q. Okay.

A. Because they were all in the meeting. And I'm sorry I don't have better notes.

Q. No. You have very nice notes.

MS. RIGGINS: All right. I'm good Mady, I will turn it over to you.

EXAMINATION

BY MS. BECH:

Q. Representative Harrison, thank you so much for taking the time and being with us today. My name's Mady. I work for Hogan Lovells. I am representing the NAACP plaintiffs and I just have a few questions about the legislative process that I'm going to go into.

A. Okay.

Q. So I will start with the basics. You spoke a little bit with us about your status as a member of the minority party on the redistricting

committee. How, if at all, does your status as a member of the minority party affect your ability to propose and pass legislation?

A. Oh, it's very -- it's not hard to propose legislation. It's extremely difficult to pass it unless it's bipartisan, absolutely bipartisan, and also usually requires negotiating with the leadership to support your efforts. So I, quite frankly, haven't had any legislation passed in more than a decade. One bill out of the House. Nothing out of the House and the Senate. But I can work across the aisle to mitigate bills. But in terms of initiating my own proposal and passing it, it's nearly impossible without bipartisan buy-in and leadership blessing.

Q. Got it. And in terms of aside from sort of that bipartisan buy-in that you might have, are there any other strategies that you use to attempt to push legislation through?

A. Well, I mean, working with the committee structure to get it heard in the first place. Obviously the outside of working with legislators and staff in the building, working with maybe efficacy groups to build support, maybe on a grassroots level to the extent that one might not

have ties to, say, the membership of the Sierra Club if you're trying to pass a bill on PFAS contamination. So sometimes you need to get some engagement in the grassroots support as well. Although, that seems to have less impact at least at this level in terms of grassroots and public support in terms of map drawing and elections related stuff. But the public pressure doesn't seem to have as much of an impact as it does in other fields.

Q. Got it. And what is your understanding of the major barriers to you being able to get, you know, proposed legislation across?

A. The major barriers beyond philosophical differences I think are just -- well, if you're talking about currently, we're in the super minority and it's very difficult to have a ton of influence and, I mean, personally I just try and work across the aisle. But I've had a lot of difficulty even on issues that aren't even perceived as partisan. I know we're talking about redistricting. But if we were thinking about even a bill related to animal welfare that has broad bipartisan support, it's been nearly impossible to get a bill passed that anyone and any member of the

majority party is strongly opposed to. It's been difficult to move. So it's just -- having been in the majority and now in the minority, there's such a strong difference between your ability to move bills on your own.

Now, I know there have been some Democratic bills that have moved. There was one on HOAs. But most of them have been at least bipartisan and much of the legislation that's moved, if it has one Democrat on it it's generally -- you know, it may have one Democratic member on it but that's -- yeah, it's been a little bit different. I just feel like it's very difficult to get something through that you don't have the blessing of the leadership on. In fact, it's impossible.

Q. Understood. Let's move specifically to the 2023 redistricting process. So do I correctly understand that your involvement in that process on the committee was primarily with the development of the House map?

A. My involvement in the 2023 redistricting, so most of my involvement was just -- well, I mean I did do the amendment. I offered the amendment. I worked on that. So specifically tangible

offering, yes. But that was it for what I did beyond all of my discussion in the committees and the floor debate just bringing up relevant issues. So, yeah, I feel like the amendment was part of it. The amendment that had the three VRA districts in the map, yeah, that was the tangible product. Other than that, it was a lot of just input in the process and what proceeded to be sort of the potential legal or constitutional issues with the map, raising those.

Q. Okay. And what did you understand your role to be as a minority member of the redistricting committee, just sort of abstractly?

A. Well, there is an effort to appoint -- okay. So the membership is maybe two-thirds Republican, one-third minority party and some of the minority party were more engaged than others. I mean I would say it's maybe not any different than any other committee membership, just trying to represent our interests. And I feel like our interests are in North Carolina citizens' interest. I know everybody thinks they're representing North Carolina citizens' interest but I don't -- just as a minority party, we're there representing the values that we think our constituents hold and

maybe even the state population holds and making sure our voice is heard and points are made that need to be made.

I don't know that I'm really answering your question. One thing that's different about North Carolina legislature versus maybe other legislatures is the leadership decides who's on the committees and it's not like the Speaker says to the House leader, Democratic leader, who do you want to be on these committees? It's been more like they decide who are on the committees. And I'm just lucky. I've gotten on all the committees I want to be on and I try to be cooperative and not too much of a pain in the neck. So I just think we're there to give an opinion and a perspective and I believe.

Q. That's great. That completely answers my question. How do you feel like the role that you actually play measured up to sort of the role you thought you should be playing?

A. I thought I've done a pretty good job in my very, very humble opinion. I try to be prepared. I try to read up in advance. I try to read through the thousands of public comments. I've tried to make sure I was up to speed on maybe

the law. We do have lawyers on Central Staff but, yeah, it's a lot of work and we don't really have a lot of our own staff. So I think I did an okay job. I tried my best anyway.

I know that I heard from a lot of constituents and I read the comments from a lot of constituents and what they expected out of the process, and I tried to convey -- since it wasn't clear that everybody was reading all the comments and they weren't getting out to the public, I tried to make sure that that sentiment that was presented in the portal was also represented in the floor debate.

Q. Did you have any specific involvement in the development of the Senate maps and the U.S. congressional maps?

A. Zero. Zero involvement.

Q. Is that -- when you say zero involvement, do you mean active involvement?

A. Oh, so in development of the maps, zero active involvement. So it has always been pointed out that the House and the Senate develop their own maps.

Am I talking too loudly? I am trying to talk loud.

MR. GARSON: You can probably talk more quietly and you'll still be picked up on the microphone.

THE WITNESS: Okay. Sorry. I feel like I'm shouting.

The House and the Senate have always developed their own maps and generally defer to each chamber. So it's been rare that we have been -- that the House members have been involved in drawing the Senate maps and vice versa. I know I raised issues -- I think I might have raised issues during the Senate debate or maybe I didn't--maybe in committee--about the VRA districts that were pointed out in the SCSJ letter. I have some recollection I might have.

But on the congressional map, we didn't -- I don't know that we really have any input. They were presented to us on the 18th, and at that point I think there were two maps. I've not talked about them on the floor but we weren't -- I don't know. I don't think we were engaged in drawing a congressional map. I know that Representative Quick offered -- I think he

offered a map alternative on the floor that was the 2022 congressional map. But I personally didn't -- beyond studying the map, I wasn't involved in the development.

BY MS. BECH:

Q. Okay. So I'm understanding you to say the maps were presented to you but you didn't really have any visibility into their development; is that correct?

A. That is accurate. That's accurate.

Q. Okay. So I'm going to focus on the House map just because that's where you had sort of the most active involvement in visibility. And just to start off with a few questions of timing of the legislative process. So in general, what was your overall impression of the timeline for enacting -- I think it's HB 898, the House map?

A. So my memory is we got it on October 18th and we had our first meeting on it on October 19th and then we were voting on it on that Monday, the 23rd. I think that was Monday the 23rd. And that seemed fairly truncated. I think that -- I think as I said earlier in the deposition, that there was some thought that we could have started earlier and that we -- to allow for more public participation

because that was pretty much absent from this particular redraw. And so I think it went pretty fast and I think that, as I said, we could have had more transparency and we could have had more public participation.

Q. Do you recall when the map redraw process began? Not necessarily when it was filed but when that drawing process began.

A. I don't have any insight when the majority party started drawing their maps. I really don't. And I know that we had the public hearings, those three public hearings in September. I don't know if the maps had been drawn before then or if they were drawn after then but I don't know when -- I don't know when that started. I just don't.

Q. Okay. And do you recall when HB 898 was ratified?

A. Well, we voted on it on the House floor on the 24th. So I guess we adjourned on Wednesday, the 25th, so I think it was the 25th. I think that the Senate voted on our maps and we voted on the Senate and the congressional maps maybe on that Wednesday. I can't recall if it was Tuesday or Wednesday but I believe it was that week that they were finalized and became public. I mean they were

public on the 18th, but a week later they were finally enacted.

Q. Got it. And how did this timeline for enacting HB 898 compare, to your recollection, to previous redistricting cycles?

A. Well, it was a much shorter time frame. I wish that I remembered 2011 better, but I do remember there being significant numbers. I had written down 63, I think, public hearings around the state of input before and after the maps were drawn. And that took awhile to go through that process.

So 2021, I do remember attending some of those public hearings, at least in Alamance and maybe it was Forsyth or Guilford. It was Forsyth, I think. Another one in the Triangle, maybe Durham, those maps. That process took longer but honestly, I can't remember how long that was. I do remember -- I do remember Chair Hall bragging, and I don't mean that in any kind of judgy way but just very proud of how transparent they were during the 2021 process, which didn't resemble at all the 2023 process.

Q. And do you have a sense of what he meant by -- what he was referring to when he was, you

know, speaking about the transparent process in the previous cycle?

A. Well, I think part of it was that the maps were being drawn in public and I think that was a big piece of it. With the exception of the concept maps, the maps were being drawn in public and I think that was a big piece of it. I think and I have some recollection it was without court order. I mean there wasn't a court mandate for the transparency but I do have some recollection of them talking about it being the most transparent map drawing process ever.

Q. And so for 2023, I'm taking it from your testimony that that process was not public; is that right?

A. Not that I recall that there was any availability to watch the maps being drawn wherever they were being drawn. And I think Chair Hall said they didn't start before the 21st of August but maybe I'm thinking that in my head. But I'm not aware that access to the room drawing was public as it was in 2021.

Q. Any sense of why the change?

A. I don't want to be speculating. I don't know except that maybe that North Carolina Supreme

Court decision freed up a lot of constraints that were behind -- that were involved in the 2021 map drawing. So I think that there was just kind of free reign to draw whatever kind of maps wanted to be drawn.

Q. Understood. Do you have any sense of why this particular map drawing process was so fast as compared to other cycles?

A. I can tell you what the speculation was, that it was bumping up to the filing deadline. It wasn't much time between the enactment of the maps and when filing deadline began. Filing began in December. That favors incumbency. And probably having a knowledge of what the districts were probably going to look like even before then also helped with their recruiting and, I think, put the Democrats at a disadvantage because you don't know what the maps look like. You can't really recruit. And then it just -- it was sort of less time to digest, less time to figure out whether you wanted to run for office and if you could be recruited to run for office.

I mean I guess there's a whole component in there that made it difficult to engage in any kind of legal challenge that would be effective

before this election coming up. So it made it impossible to, I think, mount an effective legal challenge that would affect the maps prior to the 2024 election. So that's the speculation, rumors going around. That's what a lot of people were thinking.

Q. And was it your impression that the rapid timeline affected your ability and the ability of members of the minority to put forward alternatives?

A. Well, yes. Specific to the process, yes. I think it did make it difficult. I mean I realize that the letter from Destin Hall, the e-mail went out to our leadership on the 23rd of August. But even at that point, we didn't have the criteria. We actually didn't have the criteria that they used until I asked about it in a 2019 hearing, committee hearing, and that's when Chair Hall said that he released the criteria. So we didn't even know the criteria that they considered important for map drawing. That wasn't public until the 19th. So that made it nearly impossible to draw a map, to offer a map that would be -- well, I mean not to mention all the other sort of factors that go into map drawing and getting approval from the other

side. But if you don't even have the criteria that the majority party is using to draw the maps, then you're sort of at a pretty big loss of drawing something that would be acceptable or would pass any kind of vote in the House. So, yes, that was that piece of it that was a big piece of it.

Q. And this may seem obvious to you but for my edification, what is the value of the criteria? Like how is not knowing the criteria a barrier to be able to draw maps in this particular round, based on my understanding that they were not required to be followed?

A. Well, so, yes, different this year than in past years where criteria had actually been adopted by the committee and so we knew what we were dealing with. I mean some of them were required by Stephenson and some of them are just preference of the leadership. I mean it's important to -- I don't want to not answer your question correctly. Can you repeat it? How important are the criteria? How important is it to have the criteria?

Q. Yeah.

A. Okay. So there are some criteria like five percent population deviation and whole counties, stuff like that. That's -- and the

Stephenson decision about the VRAs. That's all law. So I guess you know it's few fundamental pieces. But I mean the other pieces, it's important to know whether you favor, you know, VTD splits or municipal splits to the extent they're in conflict versus compactness and communities of interest. Those have been important criteria in the past. And not knowing which are the criteria that are important for this map drawing process for the purposes of trying to get a map enacted, is like drawing maps blindfolded, I think.

Q. Understood. Okay. I'm going to introduce a document. Bear with me. So I'm going to have to share my screen here.

Sorry, folks, I'm having a technical difficulty. Can we go off the record just so I can figure out how to sort this process?

MS. RIGGINS: That's fine.

(Off record.)

THE WITNESS: Can I look at my copy of that?

MS. RIGGINS: I don't know it's the same document.

Mady, we cannot see that at all. It's real small.

MS. BECH: Okay. Let me see here.

MR. GARSON: That's good.

MS. RIGGINS: Can you see that, Representative Harrison?

BY MS. BECH:

Q. Are you able to see that Representative Harrison?

A. Yeah.

Q. Okay, great. Do you recognize this text?

A. So it looks like it's PC for Paul Cox, I believe. Yes, that's right. I remember that text, yeah.

Q. Okay. And who is Paul Cox?

A. He's general counsel or at least counsel to the State Board of Elections.

Q. Got it. And I'll do the same thing Alyssa did. Do you understand that the bubbles in blue are your texts and bubbles in white are his?

A. I do.

Q. Okay, great. So this top text here, you say, "Hey, Paul, is there a drop dead date for completion of redistricting maps?" Do you see that?

A. Yes.

Q. What did you mean there by drop dead date?

A. Well, a date by which we had to be completed for the purposes of complying with whatever statutory requirements for establishing maybe, I don't know, for establishing -- I actually don't really remember why but there's a date related to elections. I was going to say it has nothing to do with -- maybe it had to do with -- no. For the purposes of the filing period, I think it had something to do with when the filing period could start after the maps were drawn. But there was something involved. I know it's not printing the ballots, obviously, but it was some similar kind of constraint. The question had come up several times and, as I said, I had asked our election staff, Erika Churchill and team, and they were relying on Paul for an answer. That's why I asked him directly.

Q. Got it. Okay. And so his response there, referring to mid or late November, you think that was likely sort of informed by filing deadlines?

A. It must have been. There was some issue that we had to get it done by and I think it had to do with filing deadlines which started, you know, December -- first or second week of December, I think. I can't remember the date. I actually

can't remember the date filing started. It was in December, I think.

Q. Okay. And from your perspective, was there any practical reason for sort of speeding up the deadline communicated by Paul to an October ratification?

A. Well, I mean the practical reason to get it done sooner than that was just, as I had said before, so that folks could understand the process and potential candidates who had no idea what the districts were going to look like could get an idea of whether or not they would be able to run. It's a pretty hard decision. And if you only have like a week or two between or two or three weeks between the maps being finalized and then trying to figure out if you're going to be able to run, that's a very short period of time. And, gosh, I mean there just wasn't really any time for public input anyway.

Q. Okay. I forgot to mention. I think this is -- so I can publish this, is this Exhibit 20?

MS. RIGGINS: Yes, that's right.

(Exhibit 20 marked remotely for identification.)

BY MS. BECH:

Q. I am going to share another document. So I'll call this Exhibit 21.

(Exhibit 21 marked remotely for identification.)

BY MS. BECH:

Q. Harrison 00016 and the range goes to -- the pieces I'm going to speak about go to 17 as well. So I'll let you take a moment. Can you see that? Is it big enough for you?

MR. GARSON: Can you make it a little bigger?

MS. BECH: I'll try.

THE WITNESS: Yeah.

BY MS. BECH:

Q. I'll give you a moment to read it and let me know when you'd like me to scroll down and I'll scroll to the next page.

A. Okay. Wait. I'm sorry. What was the date of that? I didn't see that. August 23rd. Okay. Yeah, I remember that. I'm not going do memorize it right now unless you want me to. If we're going to go back to it, then --

Q. No need to memorize. Okay. So you recognize this document, correct?

A. Right.

Q. Was the criteria provided to committee members? So I think it was on October 19th, I think you mentioned?

A. That is my recollection.

Q. Okay.

A. After I asked the chair about them specifically. Because I remember I was taking notes and he said he would share it with the committee and put it on the website, I think he said.

Q. Got it. So to your recollection, these were posted on the committee's website?

A. So I don't have any of my own verification but I believe the chair indicated that he was going to post it on the website. I don't know if it was.

Q. Did you receive them in any other format?

A. I believe we received them by e-mail.

Q. Okay. Do you recognize this cover e-mail here?

A. I mean I believe I recognize it, yes. I was looking at the "To," the recipient. Yeah, no, I recognize it. He distributed it to us, too, individually, members of the committee.

Q. Okay. So the date here is August 23rd, 2023; would you agree?

A. Yes.

Q. And are you familiar with the recipient, the original recipient of this e-mail?

A. Mr. Springhetti?

Q. Yes.

A. I heard his name for the first time during the August 19th committee meeting. I don't know him.

Q. Did you have any sense at that time of who he was?

A. No, actually. I heard that he had drawn the maps for Ohio but I didn't know him by reputation.

Q. Understood. In your experience, was it a normal process to hire somebody like Mr. Springhetti to draw maps for North Carolina?

MS. RIGGINS: Objection. Form.

THE WITNESS: I am aware that consultants have been used in the past to draw maps. Wasn't it Mr. Farr? Yeah. I think there have been consultants used in the past. Like I don't get engaged in that part of it but I guess Mr. Hall was very public that he had hired -- that the caucus had hired Mr. Springhetti. And I don't remember

him doing that in the past, announcing who helped them draw the maps but maybe they did. I don't remember. But I know no taxpayer money went to pay him.

BY MS. BECH:

Q. Okay. Did you personally have any contact with Mr. Springhetti at any point in the legislative process?

A. I did not. I think Chair Hall mentioned that many of the Republican legislators did interact with him over communities of interest and other concerns during the map drawing process. I believe he said that. And I think he said maybe a Democrat or two, too, but I did not personally.

Q. Okay. I'm going to stop sharing. And do you recall generally who developed the criteria that were circulated to the committee?

A. I don't have any independent knowledge of how that was done. There was a lot of similarity to past criteria, not exact. But I just assumed that it was developed by the majority party.

Q. Okay. I'm going to switch gears a little bit. So you had touched upon the idea that it would be difficult in the timeline given to offer an alternative House map as a member of minority

party. Am I correctly characterizing your testimony?

A. You are.

Q. Okay. If you had wanted to draw your own map using the criteria that we just reviewed and proposed it by the time the House Redistricting committee met the next time, would that have been possible?

MS. RIGGINS: Objection.

THE WITNESS: I'm sure that I couldn't. I don't know. I can't speak for my colleagues. So those were due by 1:00 on Monday, if I remember correctly, Monday the 23rd, and this is the 19th. So Thursday. I know that I couldn't have. I can't say that for everybody.

I tried to draw a map once back with David Lewis, in fact. I believe it was in the 2019 redistricting process. And it took forever to just draw a tiny little bit. And I can't even imagine how they get the whole state House Districts done in that time frame over a weekend, so -- when you would have to be relying on folks who would have to be working during a weekend. So I don't know

how that's possible.

BY MS. BECH:

Q. When you say forever, do you have any sense of what the actual timeline was for that previous attempt?

A. I think we were drawing a neighborhood in maybe Cumberland County or something and it was maybe like an hour and we weren't hardly getting anywhere. So I mean it was like we were just drawing like one area, one district. And we were at the terminal and it was just like -- it was very difficult, but yeah. So I don't -- that translates like one hour on part of one of the 120 districts just as -- yeah.

Q. So am I correct in understanding this map was never completed and proposed?

A. Oh, the one back in 2019?

Q. Yeah.

A. No. I abandoned it quickly. I was out of my league.

Q. You and me both.

A. But it did give me insight on how the process works and how tedious and time consuming it is, for sure.

Q. Totally. And just in terms of the formal

process of proposing something like this, can you give me sort of a description of the steps that would be involved? You know, once you draw a map, what then needs to happen to have an alternative formally proposed?

A. Well, so you get your map drawn, assuming you get it in time, and you get it to Chair Hall. He asks for them in advance of the meeting, which would have been by his 1:00 deadline. That's a courtesy for actually any amendment to -- I mean not everybody does it but it is a courtesy to offer amendments to the individual running a bill and chairing the committee if it's two different people. If it's the same person, yeah. And then you try and introduce it in committee. But the map, I don't believe they'll call you out of order but you would get -- my guess is you would get a reaction that we don't think this is a good map right now, or however that wants to be articulated, and it gets voted down on a partisan basis. That would be the approach with redistricting.

It is very rare that we get this kind of bipartisan buy-in. I think that 2021 map, House map, it got the broad bipartisan buy-in that was a cooperative effort. That's the only time I've seen

a map get accepted like that and buy-in from both parties like that. It's hard and -- yeah. So that would have been the process for this particular cycle is get the -- if you can get the map out of the staff, which is not easy because they were overwhelmed because they were also drawing Senate and congressional at the same time and it takes a long time to get these maps drawn and the stat packs. And then, you know, as I said, give it to Chair Hall. He's going to circulate it with his leadership and his lawyers back in D.C., and then present it in committee.

My recollection is that committee meeting started kind of late that day because of that problem with delays in getting the maps ready. I think we started like a couple hours later but that would have been the process.

Q. Okay. Do you have any sense of why buy-in was possible in 2021?

A. So my recollection is that there was a lot of back and forth between the House and Senate members, leadership especially, and they were able to -- and it was actually a really great feeling. I mean I did not vote for it myself because I thought there was a VRA district issue. But there

was a lot of back and forth and a level of cooperation I haven't seen in redistricting in a long time. Ever, I guess.

Q. Any sense of why that cooperation was -- you know, why it was able to happen?

A. I recall that the -- weren't these remedial maps that the Court at that time struck down? No. That was the Senate. I can't recall. Yeah. No, wait. 2021, there were some maps drawn, I thought, that were struck down and then these would have been the maps that were drawn instead.

Q. So that's the 2022 redraw post court case?

A. Yes. That's what I meant. I didn't mean to say 2021. I was thinking 2021 process but, yeah, post court case. So I think that had a lot to do with it.

Q. Okay.

A. Yeah.

Q. Okay. Go ahead.

A. I was just going to say it's just so hard with the time frame and all the redistricting lawsuits to keep it all straight. So, yeah, that was 2022.

Q. Okay. We touched a little bit on transparency of this process but I would love to

get your overall impression of the redistricting committee's level of commitment to a transparent process in 2023.

A. Well, okay. So first of all, we only have three public hearings. Was one of them in Caldwell County or Hickory? Is Hickory in Caldwell County? One was in Elizabeth City. That's the one I went to. And then one was in Raleigh. I think that was it. And I know that, for instance, Elizabeth -- so it was supposed to be like east, west, middle of the state. And I don't think Elizabeth City was particularly convenient to anybody except people who lived real near there and the hours weren't great for people who worked.

Raleigh is obviously convenient for a lot of people who get there but still it could have been more convenient. It could have been a hearing in Charlotte. It could have been one in the Triad in Greensboro and Winston-Salem. So I would say it was limited public hearings and not ideal locations or ideal hours.

So we've got three pre-map. No post-map hearings. No post-map input from the public, which I think is critical. And I know that a lot of what we heard in the 2021 -- when I keep saying 2021, I

mean the 2021-22 maps. We heard a lot. I'm sensitive to this because I'm from Greensboro. There was a lot of public comment about keeping the Triad whole and together. I mean we heard that -- I mean we got that in the public comments this time around but they didn't have the map in front of them to see it wasn't going to be that way. And I don't know if it affected it but in 2020 -- the difference between the 2021 map and the 2022 congressional map were very different and there was a lot of public input and I know it was a special master. But the Triad was whole and people were pretty happy.

So I feel like that there was a portal, thankfully, that was set up for public comment. For facility, that's easy to send your comments in. I always thought it was odd that those comments, though, were not ever made public. I mean the public can read what the other members of the public were saying and I think there's a dynamic that feeds off of that if you can see what other people are saying and are like, well, I agree and there's this point. So there wasn't that.

So I just feel like the paucity of hearings, the zero after maps were drawn, limited

access to the public portal comments and no inclusion of maybe the public comments into how the maps were developed at all, it seems like based on the disparity between the comments and how that's turned out, I think -- I mean I know we had that letter that came out I guess in August from the 20 plus 3 groups, whatever it is, that explained how much more transparent it could have been. Maybe having some different languages available or, you know, sign interpretation or whatever. So if you want to do a deeper dive, there are ways to make it more transparent and I kind of feel like we did the bare minimum and really bare minimum.

Q. This is helpful. It gives me a lot of information. Did you at any point voice these concerns to your fellow committee members?

A. I did. I voiced them from the get-go. Well, I think the get-go was the -- October 19th was the first time, I think, we had gotten together because I don't think we got together before -- maybe we did it before the hearings were announced. But I did and then I know Representative Carney also chimed in and others did as well. But I may have even had a conversation offline maybe even with the chair asking -- because we were all trying

to figure out what the schedule was going to be and it was very helpful. But it did seem clear -- it seemed clear even then that we weren't going to have the robust process we had in 2021. Yeah, 2021.

Q. Okay. And how were your concerns received to your recollection?

A. Well, just that this was the process and this was the way it was going to be basically. I mean previously articulated. And that it was impossible to weigh in the -- I remember specifically Representative Hall saying it was impossible to weigh in on the public comments. I think it was because a lot of it was contradictory. But I know he referenced one post by one individual that said gerrymander the heck out of the state and get rid of all the Democrats or something.

But my recollection was that we had a significant number that wanted like a large percentage, like two-thirds more than wanted a more public process that had advocated for a better way. And I think that -- I just think that the responses that we were getting in the committee were sort of like, well, we're just hearing from both sides and it's impossible to accommodate both sides. But,

yeah, hearing from both sides but it was like 90 percent for and, you now, 10 not weighing in on the same theme. But it was all very courteous.

Q. Okay. So was there any responsive action taken at all to these concerns when they were raised?

A. No. No, not to my recollection.

Q. And did others on the committee raise similar concerns?

A. My recollection is that Representative Carney also raised the specific concerns about public hearings and public records, too.

Q. And those concerns sort of echoed the concerns that you outlined just now?

A. Yes.

Q. Okay. And was there any responsive action taken in response to your colleagues to your knowledge?

A. No. We did not have hearings after the maps were drawn and no ability for the public to -- one of the responses was that we're going to have these hearings in Raleigh when the committee -- the committee meetings would be public. But I believe Representative Carney asked if that meant the public would be able to speak at those committee

meetings and the answer was no, but they could watch it, so -- or be in the room but they couldn't speak. No public comment period provided for the committee meetings. This is my recollection.

Q. Okay. You had mentioned that previous cycles had been more transparent I think in part because the actual map drawing process was visible to the public. Are there any other actions that were taken in the past that you recall that increased the transparency of the process?

A. Well, I do believe that the -- I mean we had the public hearings. We had more public hearings for public input and especially after maps were drawn. I think that was a big piece of it. Yeah. That's what comes immediately to mind. I'm trying to think of what else we could have done better but those are the ones that come immediately to mind.

Q. Okay. And in your experience, why does transparency matter in redistricting?

A. Well, in my humble opinion, I think the public has more confidence in the product when they watch it being made and understand the process rather than a bunch of folks in a back room drawing up maps to benefit maybe one particular party. I

just think it gives the public more confidence in the government and the product, and the ultimate product.

I don't know if there is any legal reason to beyond what maybe the courts have ordered in the past. And if the courts have ordered it in the past, it seems like they think it's an important policy. I mean I do recall there was one court decision somewhere in that mix that required some transparency, but -- so I think the courts think it's important, too. I'm not saying in the context of a legal case. But if the courts think it's important for transparency, there's got to be a basis, a public policy basis, in having transparency. But I think the most one, the most important aspect of it is confidence in -- the public's confidence in the product.

Q. And did you have a sense sort of based on your conversations with constituents reading of comments that the public had confidence in the 2023 cycle?

A. I did not. It was -- a lot of it had -- I didn't review them in advance of this deposition recently, but my memory is that there were a lot of complaints, a lot of complaints that this was going

to be another gerrymandered map and a lot of complaints we needed a better process. Granted the Democrats didn't enact an independent redistricting either but there was a lot -- and I know that's not part of the map drawing process but we got a lot of comments asking for a better way and a better process and that kept coming up, you know, and in addition keeping communities whole. Sandhills, Triad, that sort of thing. But that was important to them back home, important in how we even govern. And when the maps are being drawn for the benefit of party that's drawing them rather than the people, there was a little bit of skepticism about what's at play here. And, you know people back home clearly felt like the Triad's an area that ought to be kept whole because we're similar interests in work and play and pray, I think is the phrase.

Q. Okay. We've touched on this a little bit already but what was your general impression of the committee's providing public input in the map drawing process?

A. So the only commitment that I was I guess aware of was the portal for comments and I'm not sure -- I mean I'm fairly sure at least somebody on

the staff there in the Chair's office was reading them and we were trying to read them. It's a lot. It's a lot to read. There were a lot of comments. I think that's the only evidence, I believe, for public participation was just the ability to comment through the public portal. But I'm not sure everybody on our committee was reading and I'm not actually sure how many of those comments were taken into account when the maps were actually drawn.

Q. And you mentioned that before, sort of based on your perception that there was a disparity between the comments and the maps that were ultimately enacted. Can you expand a little bit on them?

A. Well, I think that, as I said, with the Triad and all the congressional maps. It's probably easiest to see them on the congressional maps and the fact that the Sandhills were split which is mentioned a number of times and the Triad with Greensboro being divided up into three, originally four, but then three congressional districts. I remember some talk about Chatham County but that that might have been what was fixed in the Hawkins amendment.

My brain is dead. You were asking about the disparity between the product or the comments, what kind of comments people were making. And so there was a lot of complaints about the sort of gerrymandered nature of the map and the fact that it wasn't a fairer map that really actually reflected the electorate and where you just didn't have people packed in packs into districts, where Democrats weren't packed into districts and that Democratic areas were packed into different areas to make it easier for the Republican to win. So I think there were comments to the effect of like getting fair maps, and they didn't feel like these maps were fair because it has a majority potential super majority, at least on the House side. And then the congressional map, lots to be made about the fact that it was going to be a 10-3-1 map in a purple district, in a purple state. So those were the kind of comments that we were getting.

Q. Okay. And you had mentioned there were three public hearings associated with this redraw and that you, I believe, correct me if I'm wrong, attended one of them in person and listened to two; is that right?

A. That is accurate.

Q. Okay. And what was your impression of those public hearings?

A. Well, so the one that I went to, and I admittedly -- I will admit I was late to Elizabeth City because I actually had a tire issue on my way. So I missed some of it. But it was -- my recollection of the comments there were generally we want fair maps. We want to be represented by people of our choice. It was that that area -- that particular area, there was a heavy minority population in the audience at that hearing that I could see, the ones that I went to. I mean the ones that I watched. The other two, and I couldn't get the sense because I wasn't in the room with them but I -- in terms of the population.

But as far as the commenters go, it was overwhelmingly, you know, we need fair maps. We need a better process. And that theme was repeated. And it didn't seem very even in terms of like the other side, the opposite perspective that like these maps are great. There were a few but it was overwhelming. It was sort of the same kind of percentage breakdown, it's my recollection, between online and the in-person comments.

Q. And were other legislators in attendance

at these public hearings to your recollection?

A. So my recollection in Elizabeth City is, yes, Representative Ward, who actually represents that district, was there. But I think we were the only two there maybe. Well, the chairs of the committee. I think Senator Newton and maybe somebody else. But the Raleigh I think had the biggest as far as I could tell because, as I said, I couldn't see the audience. But it seemed like Raleigh had the most legislators there and I couldn't tell about the other one as well. And I do think that was bipartisan audience there, too.

Q. Okay. So legislator attendance was, it sounds like, optional to these hearings; is that correct?

A. Absolutely. And I do believe that we, as the House Democratic members of the committee, were assured to have at least one representative at each of those locations. I don't know if -- it wasn't a -- I mean I don't know if it was technically a called meeting for public comments. Yeah. I think it was not like a redistricting committee meeting. I think it was a public hearing on the map -- on redistricting. So I don't think it was like an actual meeting. So if it had been an actual

meeting, there would have been more of, like, you need to attend. But I don't think they were -- but I can't remember.

Q. Okay. But to your recollection, how did sort of that structure where the legislators were in attendance or at the meeting as it's been formally called, was that similar to the tact taken in previous redistricting cycles?

A. You know, I'm trying to remember and I can't remember exactly. I do recall -- I mean I do recall, because it was easier to see in person, that definitely the regional reps were there. Like all the Forsyth reps were there at the Winston hearing and I think most of Guilford were there. Probably Democrats. I don't remember the process before in terms of whether it was just -- I know there's always been an effort to have somebody from the committee chair the public hearing and mostly Republicans, I believe. But they did want us at those meetings if we could be there and we would sit up like on the stage so that folks knew who were on the committee and other legislators would be in the audience, but I don't know more of the details than that.

Q. All right. To your knowledge was there

any -- well, let me step back. You had testified you had the understanding each of these public hearings occurred before the proposed House map was released; is that correct?

A. Yeah. Yes, that's correct.

Q. Okay. Was there any stated rationale for the decision not to offer public hearings after the map was made public?

A. My recollection is when that inquiry was made was that the public did have opportunity to weigh in through the portal and I think that was -- and I don't remember if it was in this context where Representative Hall said also it's the same population. I can't remember if it was made in this context that it was basically the same population that was used to draw the maps and I guess maybe just didn't see a need, but I might be putting words in his mouth. I think my recollection is that the portal seemed sufficient for getting public comments. That's my specific recollection but I can't remember anything else. I mean specific to that response.

Q. Understood. You mentioned a few sort of notable trends you had seen in comments that were submitted through the portal.

A. Uh-huh.

Q. I think concerning gerrymandering being one and sort of just lack of a transparent process being another. Am I correctly understanding that?

A. Yes.

Q. Were there any other notable trends that you noticed in the comments?

A. My recollection is they were splitting up municipalities and communities of interest. And as I said, specifically like the Sandhills and the Triad area they wanted to stay whole. But I think there are probably some -- we had in the past that notorious A & T campus getting split. So there might have been some comments in there about splitting up communities of interest. But those are the ones that stuck out. Well, the other one was let's get a better process, an independent redistricting commission. So those were the big ones that I recall.

Q. Okay. Communities of interest. Could you just for me define that?

A. So as I understand it, it's perhaps like a school population or like the campus. Like the A & T campus I think is the best example because, I mean, the congressional line went right down the

middle of campus. And the A & T University, that's a community of interest. Or it could be a neighborhood like the Oakwood neighborhood in Raleigh or something like that, those sorts of things where you go down the middle of a neighborhood and one is voting, you know, down two different districts and where they have similar concerns they might be grouped together.

I mean I recognize it's a balancing process when you don't want to split VTDs or municipalities, but generally I think there's an effort to keep communities of interest whole. I can't remember where that fits in, in the sort of legal world of redistricting law. I can't remember where that is in terms of priority but that's my understanding of a community of interest, if that's clear.

Q. It is clear. Thank you. I appreciate it. Along the same lines, you testified earlier sort of about your comments and considerations and theory of the Voting Rights Act compliance in the process of drawing the map, the House map. So just in general, if you would sort of describe your general impression of the General Assembly's commitment to that VRA compliance, what was your impression?

A. Because I raised the issue a few times. I believe that the map drawers felt like there was no racially polarized voting in our state. And my recollection is Chair Hall said there had never been a study of racially polarized -- showing racially polarized voting in our state; therefore, there was no need to draw a VRA district. That's my recollection of his response. Because as I said in my committee and floor debate that citizens clearly draw the VRA districts first before you draw any other districts within county clusters. Now, the process used by the map drawers was under the assumption that there was no need to draw VRA districts because there was no racially polarized voting in North Carolina.

Q. Okay. And is it your impression that there is or was at the time racially polarized voting in North Carolina?

A. So to be clear, I'm not an expert. But my observation is that there has been and from what I can read that there is evidence, clear evidence of it. And even the 2022 results where we lost several African-American districts that have been redrawn, you know, we have fewer African-Americans in VRA districts than we have had in the past, I

think. And it looked like from the information that was provided by SCSJ that there was pretty clear correlation between African-American voters voting for African-American candidate versus white voters voting for the white candidate.

There was one case that was just pointed out that there was a little bit -- it didn't track exactly but it seemed like all the other evidence provided, it looked like a pretty clear correlation between African-American voters and African-American candidates in these areas of the state, particularly eastern in the areas where I tried to amend and also where SCSJ wrote the article -- I mean the letter about the two Senate districts where they actually presented the study on it. So that's in my humble opinion. It does seem like there's a need for VRA districts, that there's existence of racially polarized voting and they need to draw those districts first.

Q. Got it. Okay. Bear with me. I am going to share another document here.

(Document shown remotely.)

(Off record.)

BY MS. BECH:

Q. Can you see North Carolina General

Assembly House Redistricting Committee, October 19th?

A. Yes.

Q. Okay. So let me go to page 15 of this document. You see down here at the bottom of the screen starting at line 20, I'll represent to you this is Chair Hall. This is the House committee transcript from October 19th, 2023, and that's Bates No. LD 0000001 is the beginning Bates number for this document. But here at the bottom it says, "The chair has directed today that staff publish those statistics so that folks can analyze them and determine if those criteria can be met."

Do you recall this sort of interchange with Chairman Hall?

A. I do recall it.

Q. Okay. Do you have any idea what he's referring to when he mentions statistics?

A. Well, I think it came in the context of the questions about racially polarized voting. So I assume it meant the racial data on voting results.

Q. Okay.

A. It's not a document that I -- yeah.

Q. Did committee members to your recollection

receive any racially polarized voting data for -- yeah. Do you have any recollection of what this data consisted of, where it was from?

A. So I think that it would have been the racial breakdown of the voting results, I think. And I guess it would have been, you know, however they put together the shapefiles or the stat packs, or whatever you call it, that may be how they have it broken down, I guess. I don't know how they have them broken down now, quite frankly, but this time it would include the results by race, I guess. I don't know. Like I don't draw the maps. I don't, like, understand how all that works. So it wouldn't have helped me necessarily to see that because I'm, like, I can't -- I don't know how to draw a map really. So I don't know how statistics work together when you're drawing a map. So I just recall him saying that after, I believe, I -- I don't know if he said it after or before I started talking about the VRA stuff because I do think I asked questions about that in that committee as well as the following committee. So I don't know which came first.

Q. Just to give you a little bit more context here.

A. Yeah. I think did he -- I believe maybe that -- I don't know if he said in that same context that they had gotten like a potential litigation letter or something and anticipating litigation or something. I can't remember if he said it in that context or not, that so we're going to make this available but anticipating a litigation on this. I don't know if he said it in that context. But, yeah.

Q. Okay. Generally when you say "stat pack," can you describe sort of what a stat pack was?

A. It comes attached to the map. Yeah, it's the information that's attached to the map and I'm going to look at it and -- I'm looking at Exhibit 10 and 11. Yeah. I think this is what's called a stat pack and it has what VTDs are in which district. What else is in it? It's VTDs. I think that's what the stat pack is. I actually don't know the difference between a stat pack and a shapefile. I guess the stat pack has the VTDs in it and the shapefile has the other information like election results.

Q. Understood. Okay. And the stat pack -- so if the map is released on October 18th, that would have been along with the stat pack and

published on the committee website; is that correct?

A. I believe that they -- when they release stuff to the public, I do believe they put it in the committee website as well. One of these I remember Chair Hall saying that -- because I had asked about split VTDs and his filings and stuff, and I believe he said that would be in the stat pack, that it's just been made available. But he could have said shapefiles. Honestly, like I said, I don't draw maps. I mean I tried but I don't exactly know how this stuff is done.

Q. Let's move on a little bit and stop sharing. So you had mentioned a specific concern with the House map being that VRA districts, you know, that there was no consideration of racial data to your knowledge and failure to draw VRA districts prior to other districts. Am I correctly characterizing your testimony?

A. Yes, you are. I mean that was my recollection of Stephenson was that you needed to draw VRA districts first before you do anything else and it wasn't -- it hadn't been done in this case.

Q. Okay. Did you have any other concerns

about this substance of the maps that you recall?

A. So we sort of split the duties as it came up earlier and I think that there were some concerns about the compactness. I believe there were some concerns about split municipalities and split -- yeah, split municipalities, potentially split communities of interest and -- but I don't know that -- I may have articulated that because when I offered my amendment, I think that there were maybe fewer municipal splits in the amendment than in the map that we adopted.

So I probably raised that issue about municipal splits because it was kind of a big deal because it happened in the congressional map for sure. But I'm trying to remember. They offered an amendment on the state House map. I do recall there was fewer -- I don't have it in front of me. There were fewer splits. I can't remember if it was VTDs or municipalities in addition to the VRA district because, I mean, that can have a significant impact when you've got municipal splits into different districts. I'm not sure as far as like the substance of the map. I can't remember. Are you going to refresh my memory with something I said? Because I'm so brain dead right now.

Q. No. It's totally fine. We have been going for hours.

A. I feel like I have drilled my head but I'm clearly not remembering everything well.

Q. Yeah. Well, you touched on compactness as well. So I'll try to refresh your recollection on some of the comments you made on compactness.

MR. GARSON: In this episode of Pricey deposes herself.

THE WITNESS: I mean I do remember comparing the Reock and Polsby-Popper polls, if you were going to show me that. Yeah, I mean, because I think my map was more compact. My amendment was more compact. They did not use a compactness score in the criteria. They used the visual.

BY MS. BECH:

Q. Yeah. I would like to know more about that. Can you explain what a compactness score is?

A. Y'all are the redistricting experts.

Q. Just to the best of your knowledge, your understanding.

A. Well, I mean it's just come up in the redistricting draws. It's how -- compactness seems important because you don't want districts that

look crazy like a salamander. So you want visually that look like it belongs together. And there are some tests that measure compactness. Reock and Polsby-Popper are the two that I guess we've used in the past. I mean we have used them in the past and they have been in the stated criteria. And it was interesting to me that they declined -- that the map drawers declined to use any kind of compactness score this time around. But it's just for visually and for actually a district that makes sense, so it's just not crazy stretched out in three directions. And so my recollection is, from my testimony on the amendment, that I offered that it scored better on the -- both of those scored better on the compactness. Both Reock and Polsby-Popper scored better on the amendment maps that I offered than the maps that we were voting on.

Q. Was there any articulated reason for discarding these compactness tests in this redistricting cycle?

A. I remember specifically Representative Hall explaining why they didn't and it was something about diminishing returns or something. He drilled down and -- I mean I remember him

answering. The substance of his answer I think had something to do with the fact that it just -- first of all, you're weighing issues one off against another because you've got ETJs and you've got other criteria consideration. But it wasn't -- with specifically to measuring compactness and why not this time, he said something about kind of diminishing returns is what I remember him saying but I could be wrong.

Q. Right. Okay. And to your understanding, diminishing returns sort of meant that when balanced against other considerations that it might not be helpful to have that score?

A. I believe that was my understanding. And I think they felt like a visual test was sufficient.

Q. Do you have an understanding of what a visual test is in this context?

A. I think it's just common sense. Does it look like it is a compact district or does it look like it doesn't make any sense because it's spread in spikes and salamanders or whatever, spiring. So I think that's what he was saying.

Q. All right. So it was fully based on the shape of the district?

A. Yeah. I'm sorry, yes.

Q. Okay.

A. You are totally testing my knowledge of redistricting to the maximum extent.

Q. Well, you're doing great. You're doing great.

A. You say that to all the deponents.

Q. I promise I won't torture you for much longer. Really, I promise.

A. Okay.

Q. All right. Touching just a little bit on communities of interest, you had asked a few times during committee meeting sessions whether communities of interest were considered in the drawing of the 2023 House map. Was it your impression that the redraw counted for communities of interest?

A. I recall that Representative Hall at least in one instance responded with the fact -- that was when he mentioned that individual legislators had been consulted who had concerns about keeping communities of interest in their districts whole. I do remember that coming up. But I can't remember just in general about where they came into play. I mean I do recall--I think I said this--what

definitely Zack Hopkins asked about any kind of hierarchy and priority. So there was no real -- I think he said there wasn't any real priority. And I think he said it with regard to communities of interest that it was getting input from individual legislators in terms of protecting areas, keeping areas whole that made sense based on their local knowledge.

Q. Okay. And what is your understanding of the value of keeping communities of interest whole in this process?

A. Well, I mean just the merits of having communities of interest kept whole is that you just -- these are residents who belong together. Like I said, like the A & T campus, it makes no sense to split it into two congressional districts and be represented by two separate congressmen or two separate legislators. And I remember Ralph House saying, well, you get the benefit of having extra representation, but the difference is it becomes fragmented. So you belong together. You eat, work, play, pray together and you just have similar interests and it makes sense and seems more efficient and representative to have a community of interest kept whole to the extent possible,

especially if it's easy. So not right down the middle of a town. I mean not a town, town but like a neighborhood or a school. I mean I keep repeating those but those are what come immediately to mind.

Q. Okay. And based on your experience as a legislator, was there any specific regions in writing about this House map that you thought did a particularly poor job of addressing communities of interest? I know you mentioned there were comments about the Triad and specific areas. Did you have any sense of that?

A. Well, I mean with regard to the congressional map, sure. There was just real reaction to the way the map looked as it affected Greensboro, High Point and Winston-Salem because it just got divided up. And I know those are municipalities but it is also representative in the area that is considered as an area. And I know that we've got too many people in Guilford County. We don't have enough -- we don't have enough to be one district. And combining with another city, you have to split up something. But I think we did a good job of it in 2022. I mean the ones that sort of come immediately to mind are the Sandhills and

the Triad in terms of in that -- but the Sandhills I would describe as -- and the Triad are both communities of interest in a bigger sense, not like a school campus. But yeah.

Q. Got it. Okay. Were you asked for your input on communities of interest at any point during the process of redistricting?

A. No, not beyond what Representative Hall said on, I guess, the first day; that we have a room where we can go draw a map. I had never heard that. I mean that was the first I had heard of it was the October 19th committee meeting, that we had our own room to draw a map. But that's the only kind of input that was solicited from us was you could go draw your own map in this room. But I do think that Chairman Hall, as I said, he mentioned that Republican legislators went and spoke with Mr. Springhetti and there may have been a couple of Democrats who did go in on their own initiative to protect communities of interest. I don't know how many of us were aware maps were being drawn starting on August 23rd.

Q. Got it. Okay. You had expressed in the October 19th hearing or committee meeting, you had expressed concern over drawing maps for a largely

unchanged population. Can you describe or explain that concern?

A. So I know I'm kind of repeating myself but I believe that Chair Hall used that phrase, like the population is largely unchanged, in his description. Maybe it was the public comment or in whatever context he said it. And so I believe I said sort of that begs the question; then why are we drawing the maps? Because we had a House map that had been agreed upon in a bipartisan way. Folks had come together and agreed on that map. And the constitution, as I recall, says you can't redraw a map mid decade unless under court order. So I think I was just saying it in that context. If the population is largely the same, it's not census driven and there's no court order to redraw; court permission but not court order to redraw. I was just wondering why we were drawing a new map for the House. Because we seemed to have a decent map before and they still got the super majority out of it, which I believe Zack Hopkins pointed out or Abe Jones or somebody.

Q. Okay. So I think I have probably about maybe 15 minutes more of questions, if that. Do you want to take a break? I'm happy to.

A. You're welcome to finish. Is anybody else going to grill me or is it just you?

(Conversation off record.)

(Recess taken.)

BY MS. BECH:

Q. Briefly touching on amendments because you have already touched on them quite a bit. But just for the record, was it your impression that your proposed amendments had a chance of success after being proposed?

A. No. I knew that there was very little likelihood of success.

Q. All right. And we talked a little bit about the reasons for having difficulty in passing legislation for you. Was there anything that's differed in your sort of estimation of whether or not this particular proposal would be successful?

A. Oh, no. I was going to say the specifics of this amendment, the reason I knew that it might have less likelihood of success beyond just in general being offered by a Democrat in a very Republican driven process with no bipartisanship was just that the seeming refusal to acknowledge that there were VRA issues, racially polarized voting issues, and that's what this amendment was

about. I had a good feeling it was unlikely to pass but I thought it was important anyway.

Q. To your knowledge, was this amendment the only amendment that sought to sort of correct for VRA compliance that you're aware of?

A. Until the -- well, on the House maps, yes. And, you know, I think on the congressional map in the House, I believe that the map there, the map -- the amendment was based on the current maps, the congressional breakdown. And I do believe that technically that district, Don Davis' district, District 1, I believe that that doesn't have VRA problems. But I'm not sure you could say that about the congressional map that we enacted that does seem to maybe have VRA problems. So technically to answer your question, I would say on the congressional map that was -- I don't believe that point was raised in the offer by Representative Amos Quick but I think it would have remedied a potential VRA problem in the congressional map as well. Yeah, just sort of what I'm thinking.

Q. And that particular amendment to your knowledge, was that passed?

A. The amendment that Representative Amos

Quick offered did not pass. It failed on partisan lines.

Q. Okay. And just for the record, is it fair to say that your concerns about the 2023 redistricting process, you know, including the VRA compliance, transparency, lack of public input, did those concerns extend to the congressional and Senate maps as well?

A. Well, yes. Yes. I had more intimate knowledge on the House side for sure, but definitely those ran across all three maps' efforts, yes.

Q. Got it. Okay. We have touched upon a little bit the letters we received by committee members from advocacy organizations but I'm going to touch on them briefly again starting with what I believe was Exhibit 6 that you already have that I'll share my screen.

(Exhibit shared remotely.)

BY MS. BECH:

Q. So this is the September 25th letter --

A. Yes.

Q. -- from Abacus. So you recognize this. You've already taken a look at it. I'm going to scroll to page what I believe is -- I'm sorry. My

screen is in the way -- 94 and focus again on these specific suggestions that were raised in this letter. So in terms of adoption, let's start with the first here. So there's "Immediately consider and publicly adopt redistricting criteria that are compliant and consistent with the law."

To your knowledge was this suggestion implemented?

A. No. We had no redistricting criteria at all on -- yeah. I mean we just had the guidelines that were provided to Mr. Springhetti, not formally adopted. So no.

Q. Okay. And second here, I believe you testified that it's your view that public input was not taken into account on the drawing of the maps; is that correct?

A. That's right.

Q. To your knowledge was the basis for the changes in District 1 explained to the public?

A. So I'm thinking. Why are we doing this? I want to say because they can, but I don't -- I mean to the extent that you mean beyond the fact that the court reversed the previous court's decision and which -- so we knew the congressional maps had to be redrawn anyway because they were

only there for the 2022 election and I guess that's sort of widely known. But I think the only explanation was because the -- if I recall correctly, it was that the court's decision prior to the current court's decision was based on faulty logic and faulty legal theory, and so they wanted to -- no. So that's it. I mean just the decision that required the redraw of the maps for the 2022 election, the decision was reversed. And so I mean I think there was no explanation beyond that basically, if that makes sense. I don't know that I'm really answering your question but I think --

Q. Yeah. So was there any sort of public outreach making any attempt, regardless of what it was, to explain sort of the impetus for redrawing maps to your knowledge?

A. I don't remember. There may have been an explanation in the beginning of the committee hearing on the 19th or the 23rd, but I don't recall what was said to give it context. I'm sure there was something said.

Q. Sure. And the next bullet point, "Allow for at least two weeks of public comment and legislative hearings after the draft maps are released and prior to vote." I recall your

testimony being that this did not occur; is that correct?

A. It did not. And there was only, what, four days, five days, six days between the release of the map and the vote. So if I'm doing the math right, 18th to the 24th. So, no, there wasn't even two weeks between -- well, no. I'm sorry. That doesn't make any sense. Scratch that. Scratch that.

No. The answer is, no, there was not.

Q. Okay. And we've talked about sort of the limited public hearings that occurred. So in terms of the next bullet point and the suggestion that time is built in to hold public comment hearings in each metropolitan and micropolitan area, would it be your testimony that that did not occur?

A. That's accurate. It did not occur.

Q. Okay. Was there any, speaking to the next bullet point, written evaluation of each of the maps explaining why the committees drew the districts the way they did?

A. That did not occur, to my recollection.

Q. All right. And I think we had spoken about to your knowledge there was no live stream of any map drawing process; is that correct?

A. That is my recollection.

Q. Were you aware if any language access and live interpretation occurred to assist during this process of redrawing?

A. No.

Q. Okay. How about audio and visual support?

A. No, not -- I mean not beyond fixing the live stream when it went down. No. Oh, I see. For disabilities. The next page. Okay. No.

Q. Okay. And generally when this letter was received by committee members, what did the committee members do with this letter?

A. Well, I read it. I mean personally I don't know what the rest of the committee members did with it because I don't think we met. I don't think we had met by then. I'm trying to remember when our first meeting was. We may have had a joint meeting. And this is what I can't remember, where they set out the idea that we were going to have these three public hearings. I don't know that this was all done by e-mail, so we must have had some kind of meeting. But I do -- I mean I do recall raising this issue but I don't -- I mean some of the points that were made in here. But I don't know if that was in the October 18th meeting

-- I mean 19th meeting -- or if it was separately to some specific points like a conversation with Chairman Hall about whether or not we were going to have public comments after the maps. I know several members had those questions of their leadership in the House and the Senate, but I don't know if we had a formal process for responding to this.

Q. Okay.

A. And, no, we didn't get together to say how are we going to do this to comply with this letter? We didn't do anything like that. But I don't know if there was the opportunity for us to input publically beyond the October 19th meeting to ask are we going to be able to do this because I -- I have some recollection that there was a similar letter that was distributed in the '21 redraw and I remember being able to ask about that. I don't know that we had that chance here, collectively I mean.

Q. Okay. And to your knowledge were there any, whether written or informal or formal, articulated reasons for not implementing many of these suggestions in the letter?

A. Nothing beyond what I believe we talked

about earlier maybe about like public -- the opportunities for public participation, that there was the portal and that there were the committee meetings. So I don't think that we got a specific response to any of this beyond those comments that were raised in committee about the process.

Q. Okay. In your opinion what should the legislature have done with these suggestions?

A. Well, in my humble opinion we could have started earlier because we knew these maps needed -- well, we knew at least the congressional map needed to be drawn. We didn't know the intentions of the leadership in terms of what was going to happen with the House and the Senate. I mean the Senate, I guess, had to be redrawn. So it was good. There was something about the Senate challenge. I'm not remembering all the details.

So what we could have done is we could have started earlier. We could have gotten input from the -- we could have gotten input from the public before the maps were drawn because it's always helpful to know what people want to see. And then we could have drawn the maps in public and we could have made it more accessible the ways that were addressed in this letter in terms of

disability and language limitations and that sort of thing. And then we could have had significant, you know, public debate after the maps were drawn and then maybe reconsidered whether we were going to actually adopt these maps after we got the public input. I just think it makes for a more inclusive transparent process that the public has confidence in. I mean these aren't unreasonable requests and they could have been accommodated. I guess that's my answer.

Q. Okay. Moving on to the next letter which I'll share now.

A. Can I add something else? Because I'm going to put it in the list.

Q. Sure.

A. We could have held on to our records. We got this warning that we were going to be -- you know, when we added that budget provision on repealing the retention of records related to redistricting, when that provision was added to the budget and it was no longer required, I think that could have helped with openness, too, was to retain our records. We could have retained our records. I don't know about others but I think that's a piece of the public confidence, too.

Q. Okay. Thank you. I am going to move on to and share my screen to the next letter that was received on October 3rd, and I don't believe that this was made an exhibit before. I think we're moving up to Exhibit No. 21.

(Exhibit 21 marked remotely for identification.)

BY MS. BECH:

Q. I'll just give you a second to read the first page here.

A. All right. I'm good.

Q. Okay. So if you move down to this first paragraph here under the heading, "North Carolina Voters Reject Partisan Gerrymandering," you'll see there it says, "Redistricting criteria for any redraw must comply with applicable law and be consistent with the values, interests, and needs of North Carolina electorate. A recent survey shows the overwhelming majority--nearly 90 percent--of North Carolinians oppose partisan gerrymandering, and 70 percent believe gerrymandering is a major problem here."

Is that statement sort of consistent with your understanding of the public view of gerrymandering?

A. That is. Yeah, especially based on the comments that I read in the 2021 and the 2023 redistricting cases. Yes.

Q. Okay. And then moving here to the three actions that the writers of this letter believed that the General Assembly should take in light of the US and North Carolina Supreme Court cases Milligan and Stephenson. You have first here that the General Assembly must alter its criteria from 2021 to allow for consideration of race in a way it will protect North Carolinians against illegal voting dilution. Did I characterize that paragraph correctly here at the first?

A. Yes.

Q. Okay. We've spoken about this but just for the record, was this action taken in redrawing of the House map?

A. Well, there was no race consideration in the drawing of the House map. So no.

Q. Okay. And then we've spoken a bit previously but the second paragraph speaks about the need to perform a localized racial polarization analysis. I understand your testimony previously to be that that did not occur. Is that accurate?

A. That is my recollection and assumption. I

believe I testified that the only evidence I saw was in that 2021, Dr. Lewis. But I wasn't aware of any racially polarized voting analysis conducted by the legislature.

Q. Okay. We've spoken about this as well but it looks like was it your testimony that the House map did not account for VRA compliant districts prior to developing the other districts?

A. That's accurate.

Q. Okay. So overall do you think that this letter accurately describes the General Assembly's obligations in the 2024 House map redraw?

A. I thought so.

Q. Okay. And once this letter was received, which I believe was around October 3rd, does that -- do you recall receiving this letter around then?

A. I do recall receiving it then.

Q. Okay.

A. Yes.

Q. Was there any formal consideration of this letter by members of your committee that you're aware of?

A. So I am not aware that our redistricting committee as a whole considered it. I know that I

do recall discussing it with my Democratic colleagues on the committee but I am not aware that we ever discussed it in committee beyond my speaking to it during the October 19th and, I believe, the October 23rd and maybe a little bit on the 24th hearing.

Q. Okay. And again were there any articulated -- actually scratch that.

In your opinion what should the committee have done with this letter?

A. Well, I think we should have adhered to the suggestions because, I mean, I think they laid a good case about why it was important. And that's why I tried to continue to raise those issues during the debate. But I just sort of feel like the letter was ignored, not by our side. And I'm sorry to sound so partisan. I don't mean to sound so partisan, but I don't think the map drawers took it into consideration as they could have -- should have.

Q. Understood. Okay. The last letter I believe that was sent on October 22nd, and I think it is captured with its appendices in Exhibit 16 and 17 that we provided to you.

A. I have it.

Q. Okay. All right. So for the first paragraph of the letter it purports to provide racially polarized voting analysis for the purpose of -- sorry. In response to an invitation of Chairs Hise and Hall. Is that consistent with your recollection?

A. Wait. That these letters -- I'm sorry. What did you say? That these letters were sent?

Q. I can rephrase. From your memory is it accurate to say that the Southern Coalition for Social Justice was invited by Chairs Hise and Hall to provide that analysis?

A. I'm sorry. Yes. Right there in the first line. I remember that now, yes.

Q. All right. And then scrolling down here, I don't know that you've seen this piece before but on page -- it's 00047. There is an expert report of Dr. Kassra A.R. Oskooii.

A. So is that the one with all the graphs in it? Because I don't think I have that one. I just have the --

Q. Yeah.

A. I have the Appendix B. I have the letter and I have Appendix B but I don't think I have the hard copy of his actual study.

Q. Understood. Just in scrolling through, does this look familiar to you? Does it look like something you've seen before that you were provided?

A. I'm not seeing anything on the screen, if you're trying to show it on the screen.

Q. Sorry. That would help.

A. I was working from the hard copies of Exhibit 16 and 17 but we don't have this in the record.

Q. Yeah. The expert memo of Dr. Kassra A.R. Oskooii.

A. Yes, I've seen that.

Q. To your knowledge was this report discussed by the committee?

A. My recollection is that I raised it. I raised the study and issue in the committee and maybe on the floor, too. But I don't think we did -- I mean I don't think we discussed it as a report. I just think I raised the issue. I think it was partly dismissed because it was only Senate district, even though the letter clearly said they didn't have time to do it and it shouldn't be interpreted to mean that it doesn't apply to the House, too. But, yes, we didn't like discuss it as

a committee. I just raised it during committee and, I think, floor debate.

Q. Okay. Did you at the time review this report, to your memory?

A. I did. I did. I read all that, yes.

Q. And is it your memory that this sort of set out analysis of racially polarized voting in certain localities in North Carolina?

A. So it's -- I believe it's the first time I've actually seen a racially polarized voting analysis, so I don't believe I had anything to compare it to.

Q. Okay.

A. But I do believe it made the case and I do believe Southern Coalition of Social Justice made a more succinct case about it and made a compelling case.

Q. Okay. And then you've already taken a look at the Appendix B --

A. Yeah.

Q. -- that was provided in connection with this letter as well. Was there ever any formal discussion or consideration of Appendix B within the committee?

A. No formal consideration. But as I

mentioned, I believe I raised some of these statistics during the debate and I believe also maybe Leader Rieves did as well in his debate on -- maybe it was on his -- when I was doing the amendment. I think when I offered the amendment, I believe that Leader Rieves also referenced some of the information in here, I believe.

Q. Okay.

A. But it wasn't a formal discussion of the committee about what this meant.

Q. All right. That's all I have for documents. I realize that I have a piece of this document that was not part of the previous exhibit. So what I could do is separate that out and add that as an additional exhibit, Exhibit 22, or I can just include all this as Exhibit 22. Is there a preference, Ms. Boyd, in terms of how to do that?

MADAME REPORTER: That's up to the attorneys.

MS. RIGGINS: Whatever you want to do, Mady, is fine.

MS. BECH: Maybe for cohesion, I'll include the entire document as Exhibit 22 and mark it that way.

(Exhibit 22 marked remotely for

identification.)

BY MS. BECH:

Q. This is truly the final stretch. I apologize. I'm still learning how to be a lawyer but we're getting close to the end here.

A. All good.

Q. So I just wanted to touch briefly because you testified briefly about conversations that you have had with Hilary Klein of the Southern Coalition of Social Justice and I just had a few questions, clarifying questions, on that subject. So have you communicated with Ms. Klein about the substance of this case since you were subpoenaed to testify?

A. No.

Q. Okay. Has Ms. Klein in any way tried to influence your testimony today?

A. No.

Q. In general, what was the purpose of -- you spoke about a few conversations that you have had with Ms. Klein in the past. Can you generally describe just the purpose of those conversations or your rationale for having them?

A. Sure. So I'm pretty sure that it was a followup to the letters that we received and I had

questions about them. And so we're friends. We're friends. My niece goes to school with her son. I've known her for a long time. So there might have been conversations that weren't related to this. But conversations related to this, I think, were specific to follow up on the letters that Southern Coalition sent us, these letters in here, these three letters they sent us. It was followup. And I think that's what precipitated that e-mail that referenced Dr. Lewis. I think that was -- I'm foggy with the date but I think it has to do with followup to the racially polarized voting letter, the October 22nd voting letter. I will check the date. But, yes, I think that's what -- so it was October 24th. So, yeah, I think I must have contacted her after that October 22nd letter about the racially polarized voting to understand a little bit better the concept. So that was the nature of our conversation. I haven't talked to her substantively about this at all since this letter.

Q. Okay. And you touched on this a little bit but is it common practice for legislators to talk to outside advocates and experts on issues affecting legislation?

A. Quite often, yes. That's routine.

Q. Okay. Same line of questioning about Ann Webb. First of all, can you just remind me who Ann Webb is?

A. She's currently at Common Cause. I don't know if she's general counsel or policy director or what her title is but she works on elections-related matters.

Q. Okay. And have you communicated with Ms. Webb about the substance of this case since you were subpoenaed to testify?

A. I have not.

Q. Okay. Has Ms. Webb in any way tried to influence your testimony today?

A. She has not.

Q. And then finally to Bob Phillips, who I believe you mentioned in prior testimony as well. Have you communicated with Mr. Phillips about the substance of this case since you were subpoenaed to testify?

A. No.

Q. And has Mr. Phillips in any way tried to influence your testimony today?

A. No.

Q. Okay.

MS. BECH: Well, congratulations. That's all I have for my questions unless others have something to add.

MS. RIGGINS: Mark, Lilly, Olivia, do you guys have anything?

MR. HAIDAR: Mark Haidar for Williams Plaintiffs. I have nothing to add. Thank you, Mady, for the questions and, Representative Harrison, for your time. Thank you.

MS. MOLODANOF: Nothing for me. Thank you.

MS. TALERMAN: Nothing.

FURTHER EXAMINATION

BY MS. RIGGINS:

Q. Just a couple of things real quick, Representative Harrison. You were asked some questions by Mady about the transparency of the 2021 process v. the 2023 process. Do you recall that?

A. Yes.

Q. And I think you discussed that during the 2021 process, the rooms in the computers were live streamed online?

A. That was my recollection, but -- yeah,

that was my recollection. There is some chance that I mixed up the 2021 and 2022 because I was conflating them, but my recollection was that we were drawing those in front of a camera.

Q. Yeah. Do you recall that Common Cause employee Tyler Dayes actually complained about the computers and the live streams in testimony during the Harper v. Hall trial?

A. I do not remember that.

MS. RIGGINS: No further questions from the legislative defendant.

(Deposition concluded at 3:25 p.m.)

(Witness reserves signature.)

(After the deposition concluded, Ms. Bech notified all parties she was marking Exhibits 20A and 20B to be attached as a part of the proceedings.)

UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 23-CV-1057 and 23-CV-1104

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official CAPACITY as Chair of the House Standing Committee of Redistricting, et al.,

Defendants.

REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
MARY PRICE TAYLOR HARRISON
October 10, 2024

I, CYNTHIA S. BOYD, Registered Professional Reporter and Notary Public, hereby certify to the following:

That the witness, MARY PRICE TAYLOR HARRISON, was duly sworn by me and that the transcript of the oral deposition is a true record of the testimony given by the witness;

I further certify that pursuant to FRCP Rule 30(e)(1) that the signature of the deponent:

X was requested by the deponent or a party before the completion of the deposition, to be returned within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefor;

was not requested by the deponent or a party before the completion of the deposition.

I further certify that I am neither attorney nor counsel for, related to, nor employed by any of the parties to the action in which this testimony was taken.

Further, I am not a relative or employee of any attorney of record in this cause, nor do I have a financial interest in the action.

Subscribed and sworn to on this the 21st day of October, 2024.

CYNTHIA S. BOYD, RPR

Notary Public No. 19950620047

A C K N O W L E D G E M E N T OF D E P O N E N T

I, , declare under the penalties of perjury under the State of North Carolina that I have read the foregoing pages, which contain a correct transcription of answers made by me to the questions therein recorded, with the exception(s) and/or addition(s) reflected on the correction sheet attached hereto, if any.

Signed this the day of , 20 .

(Witness signature)

State of:

County of:

Subscribed and sworn to before me this day of , 20 .

Notary Public

My commission expires:

ERRATA SHEET

Witness Name:

Date of Deposition:

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