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

SHAUNA WILLIAMS, et al., Plaintiffs, v. REPRESENTATIVE DESTIN HALL, et al., Defendants.	Case No. 1:23-cv-01057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., Plaintiffs, v. PHILIP BERGER, et al., Defendants.	Case No. 1:23-cv-01104

STATE BOARD DEFENDANTS RESPONSE TAKING NO POSITION

Pursuant to the Court's October 22, 2025 TEXT ONLY ORDER, Defendants the North Carolina State Board Elections, and Francis X. De Luca, Stacy Eggers, IV, Jeff Carmon, III, Siobhan O'Duffy Millen, and Robert Rucho named in their official capacities ("State Board" or "State Board Defendants"), hereby submit their Response taking no position on whether

recently enacted Senate Bill 249, which creates a new Congressional map for the State of North Carolina, affects the claims submitted to the Court in these consolidated cases. The State Board also takes no position on the Williams Plaintiffs Motion for Leave to File a Supplemental Complaint [D.E. 169].

As the State Board has previously stated in this case, if changes to the current district maps are made as a result of this litigation, the impact on the elections calendar will depend on the scope and timing of such an order. To accommodate changes to the current maps without delaying any administrative dates or deadlines for ballot preparation and distribution for the March 2026 primary, the State Board would need to receive the new map by December 1, 2025, which is approximately six weeks (38-42 days) before absentee voting is set to begin for the March 2026 primary.

CONCLUSION

The State Board Defendants stands ready to provide any and all information required by the Court regarding the election schedule, relevant deadlines, and practical administrative considerations

[Signature Page Follows]

Respectfully submitted this the 24th day of October, 2025.

NORTH CAROLINA DEPARTMENT
OF JUSTICE

/s/ Mary L. Lucasse
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Counsel for State Board Defendants

CERTIFICATE OF SERVICE

I, Mary L. Lucasse, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification to counsel of record.

This the 24th day of October, 2025.

/s/ Mary L. Lucasse
Mary L. Lucasse
Special Deputy Attorney General