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' REPLY IN SUPPORT OF THEIR MOTION FOR A PRELIMINARY INJUNCTION

In their opposition brief, Doc. 201 ("Opp."), Legislative Defendants do not dispute the facts underlying NAACP Plaintiffs' preliminary injunction motion. Instead, they erroneously assert that these claims are foreclosed by *Rucho v. Common Cause*, 588 U.S. 684 (2019). Opp. 5.[1] But Plaintiffs do not bring partisan gerrymandering claims. None of Plaintiffs' theories of liability rest on any "instinct that groups with a certain level of political support should enjoy a commensurate level of political power and influence" or concepts of "proportional representation," nor do they require the court to resolve any "question . . . of degree" of partisan dominance across a challenged plan. *Rucho*, 588 U.S. at 704-05.

Instead, Plaintiffs' First Amendment claims of unlawful retaliation and infringement on their right to petition rest on "clear, manageable, and politically neutral" legal standards free of any consideration of partisan fairness or proportionality, *id.* at 704—indeed, with respect to First Amendment retaliation, the applicable framework is well-established. *See Williams v. Mitchell*, 122 F.4th 85, 89 (4th Cir. 2024). Plaintiffs' claims address an unprecedented turn of events beyond any circumstance considered in *Rucho*: the NCGA's gratuitous decision to redraw *its own plan* for no other purpose than to retaliate against voters.

Plaintiffs' claims thus are not precluded by *Rucho* or any other authority. The facts effectively now conceded by Defendants support Plaintiffs' likelihood of success on those

[1] Page citations reflect ECF pagination. Defendants also rely on their motion to dismiss arguments. *See* Opp. 2 (citing Doc. 193). Putting aside the questionable propriety of this approach, *see* LR 7.3(d)(3), Plaintiffs will more fulsomely address those arguments in their November 21 opposition.

claims. The equities of enjoining SB249 and maintaining the status quo also weigh heavily in Plaintiffs' favor. Plaintiffs' motion should be granted.

I. Plaintiffs' First Amendment Claims are Outside the Scope and Holding of *Rucho*.

In *Rucho*, the Supreme Court held that partisan gerrymandering claims "sound in a desire for proportional representation" and thus "present political questions beyond the reach of the federal courts" because "[f]ederal judges have no license to reallocate political power between the two major political parties." 588 U.S. at 704, 718. The litigants in those matters proposed various metrics to assess the partisan fairness in a plan, to essentially conduct an evaluation of "how much partisan dominance is too much" when legislators engage in redistricting. *Id.* at 703-05. The Supreme Court held that those theories of policing political fairness posed justiciability issues because there are no "precise standards that are clear, manageable, and politically neutral" for conducting such inquiries; in the Court's view, "it is not even clear what fairness looks like in this context." *Id.* at 706-07.

Plaintiffs' claims here do not implicate any of these concerns, and thus fall beyond the scope of *Rucho*, for a simple reason: Plaintiffs' allegations of First Amendment harm do not depend on *how* or *where* specific lines were drawn or any allegations that they deny fair or proportional representation to any partisan group. Instead, Plaintiffs' First Amendment claims concern *why* the NCGA decided to gratuitously redraw their own congressional districts without any legitimate purpose. Plaintiffs thus challenge the NCGA's decision to retaliate against voters in District 1 for protected speech by gratuitously redrawing their district lines, relying on the well-established First Amendment

retaliation standard that applies whenever government power is used to target citizens for their beliefs and expression (Suppl. Count 10). And Plaintiffs challenge the NCGA's use of the redistricting process to directly frustrate their ability to petition the courts for redress of grievances (Suppl. Count 11).

These claims, squarely trained on the decision to redistrict at all and not on any particular district lines, are beyond the scope of *Rucho*. In *Rucho*, as in every pre-*Rucho* partisan gerrymandering case,[2] the legislature had some otherwise-legitimate government purpose for redistricting: (1) following the release of the Census, *e.g.*, *Gill v. Whitford*, 585 U.S. 48, 54-55 (2018), *Ohio A. Philip Randolph Inst. v. Householder*, 373 F. Supp. 3d 978, 994-95 (S.D. Ohio 2019), *Benisek v. Lamone*, 348 F. Supp. 3d 493, 498-506 (D. Md. 2018), *League of Women Voters of Michigan v. Benson*, 373 F. Supp. 3d 867, 882-84 (E.D. Mich. 2019), *Vieth v. Jubelirer*, 541 U.S. 267, 272 (2004); *Gaffney v. Cummings*, 412 U.S. 735, 736 (1973); *Davis v. Bandemer*, 478 U.S. 109, 113 (1986); (2) pursuant to a court order, *e.g.*, *Common Cause v. Rucho*, 318 F. Supp. 3d 777, 805 (M.D.N.C. 2018); *Hunt v. Cromartie*, 526 U.S. 541, 543 (1999); or (3) to replace a court-drawn map with a legislature-drawn map, *e.g.*, *League of United Latin Am. Citizens v. Perry* ("*LULAC*"), 548 U.S. 399, 411-13 (2006). Because the legislature had some neutral justification for its decision to redistrict in the first place, there was no direct causal link between the redistricting decision and the plaintiffs' alleged injury. Without that link, those cases necessarily reduced to disputes over the political character of the map the legislature

[2] *See* Doc. 193 at 11 n.4 (citing cases).

ultimately drew, *i.e.*, nonjusticiable partisan gerrymandering challenges. *See, e.g.*, *Rucho*, 588 U.S. at 718.

Here, the link is unbroken. Defendants do not substantively dispute that the sole reason for undertaking redistricting in the first place and redoing their own handiwork was to punish voters for protected speech. Nor do they dispute that the effect of this stratagem is to frustrate a final judicial review of Plaintiffs' pre-existing claims. The claims here do not devolve into any nonjusticiable question of partisan fairness but are trained firmly on the use of government power to punish citizens and thwart the judicial process.

It does not matter that *Rucho* included claims that were styled as First Amendment claims. *See* Doc. 193 at 13-14. The allegations of First Amendment harm in *Rucho* involved partisan vote dilution and voters' lack of enthusiasm and indifference to voting caused by excessive use of partisanship among redistricting factors, and the impact that lack of voter engagement would have on fundraising, attracting candidates, and mobilizing voters. *See* 588 U.S. at 713-14. The Court found that theory of harm led right back to the how-much-is-too-much problem, because it offered no way to distinguish permissible from impermissible partisan motivation; instead, the Court was concerned that, under the plaintiffs' theory, "any level of partisanship in districting would constitute an infringement of their First Amendment rights." *Id.* at 714.

Here, Plaintiffs' harms arise from the decision to redistrict in the first place as a retaliatory adverse government action. The shifting of district lines—which would not have occurred absent Defendants' retaliatory decision to gratuitously redistrict—has created concrete and personal associational injuries to Plaintiffs that reach beyond electoral results:

being removed from their home district and stripped of their relationship with their representative, losing their networks of civic engagement, *see, e.g.*, Docs. 183-7 (Johnson Decl. ¶¶5-16); 183-6 (C. Jones Decl. ¶¶8-13); 183-8 (Sutton Decl. ¶¶12-13); 183-9 (Patterson Decl. ¶¶8-9), and chilling Plaintiffs' ability to petition the court for redress of grievances, *see* Doc. 183-11 (J. Jones Decl. ¶15). These harms do not hinge on whether voters enjoy better or worse electoral opportunities in their new districts—as in *Rucho*—but arise from the concrete, personal burdens imposed by the decision to redistrict at all. Defendants do not contest the fact of those harms for purposes of the preliminary injunction motion.

Moreover, no harms to the right to petition the courts were ever raised in *Rucho* or any pre-*Rucho* matter. While all First Amendment rights are necessarily related and thus "cognate," "[c]ourts should not presume there is always an essential equivalence in the two Clauses or that Speech Clause precedents necessarily and in every case resolve Petition Clause claims." *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 388 (2011). The facts of this case, giving rise to unique threats to the right to petition the courts for redress, are totally unlike *Rucho* in that way too.

For the same reasons, Plaintiffs' claims are sharply distinct from those rejected by a plurality of the Supreme Court in *LULAC*. There, the legislature replaced a court-drawn map with their own map, a baseline legitimate purpose given that "a lawful, legislatively enacted plan should be preferable to one drawn by the courts" such that "no presumption of impropriety should attach to the legislative decision to act" to redistrict under those circumstances. 548 U.S. at 416. While *LULAC* plaintiffs *attempted* to argue that the mid-

decade district changes were solely motivated by partisan objectives, that fact was disputed. *Id.* at 417. In rejecting this claim, the plurality opinion noted several times that the legislature's purpose was to replace a court-drawn map, *e.g.*, *id.* at 419 ("[T]here is nothing inherently suspect about a legislature's decision to replace mid-decade a court-ordered plan with one of its own[.]"), and found that "partisan aims did not guide every line it drew" where "some contested district lines were drawn based on more mundane and local interests" and "a number of line-drawing requests by Democratic state legislators were honored." *Id.* at 417-19. Similarly to *Rucho*, this posed a fatal problem for the *LULAC* plaintiffs because "[e]valuating the legality of acts arising out of mixed motives can be complex, and affixing a single label to those acts can be hazardous, even when the actor is an individual performing a discrete act." *Id.* at 418; *see also id.* at 423.

But here, Defendants do not contest as a factual matter that their retaliatory motive of punishing voters for their voting behavior (*e.g.*, ejecting voters from their congressional district for supporting disfavored candidates in the prior election) was the sole and "but-for" cause of the 2025 redistricting. Opp. 9. The lead map-drawer Senator Hise disclaimed attempting to address any legitimate redistricting factors. *See* Doc. 201-6 at 22:16-20 (Sen. Hise: "I did not identify any additional things that had to be remedied…").[3] At base, the plurality in *LULAC* rejected claims that "a legislature's decision to override a valid, court-drawn plan mid-decade is sufficiently suspect to give shape to a reliable standard for

[3] Dr. Michael Barber's assertion that the 2025 districts are "more compact, geographically coherent, and consistent with traditional redistricting principles" is inapposite. Doc. 201-5 at 5. It is also incorrect for the reasons explained by Anthony Fairfax. *See* Doc 183-2 at ¶¶9-12; Reply Ex. A (Fairfax Reply).

identifying unconstitutional political gerrymanders." 548 U.S. at 423. Those claims are not present here.

Plaintiffs' retaliation claims are distinguishable from *Rucho* on additional grounds. The baseline assumption in *Rucho*, and indeed until the unprecedented actions here, was that districts would be set in place until the next census. This introduced the difficulty of assessing whether alleged partisan vote dilution was likely to persist over several election cycles. *Rucho*, 588 U.S. at 711-12. The NCGA's actions here invite the opposite assumption: that districts will be *continuously redrawn* after each and every election, allowing the legislature to stymie dissenting speech via retaliatory, gratuitous redistricting.

Plaintiffs' Petition Clause claim (Suppl. Count 11) is also beyond the scope of *Rucho*.[4] The First Amendment harms alleged here, concerning the right to petition the courts, are entirely distinct from those in *Rucho*. *See* 588 U.S. at 713-15. Nor could *Rucho*'s rationale control this claim, since both Plaintiffs' right to petition the courts and the infringement of that right can be readily established without *any* consideration of partisanship by this Court.

Finally, the remedy requested here—reversion back to the NCGA's own plan—is also different in kind from what was asked of the Court in *Rucho*.[5] This requested remedy would not require the Court to "reallocate political power between the two major political parties" as would be required to remedy claims of partisan gerrymandering. *Rucho*, 588 U.S. at 718.

[4] Supplemental Count 12, not at issue in this motion, is also beyond the scope of *Rucho*.
[5] Plaintiffs maintain their challenges to the 2023 Congressional Plan. *See* Doc. 183 at 26, n.3.

The unprecedented facts before the Court in this matter are both beyond the scope of the holding in *Rucho* and give rise to harms never considered by the Supreme Court in that, or any prior, matter. Defendants' justiciability arguments should be rejected.

II. Defendants Do Not Dispute Any Evidence Supporting Plaintiffs' Motion.

Plaintiffs' claims are not foreclosed by *Rucho* or any other authority as Defendants contend in their sole argument contesting Plaintiffs' likely success on the merits. *See* Opp. 5-6. Defendants' failure to contest the factual basis of Plaintiffs' motion merits granting the relief requested.

Turning first to Plaintiffs' First Amendment retaliation claim (Suppl. Count 10), Defendants do not dispute any of the legally-relevant facts. *See* Doc. 183 at 11-12 (citing standard set forth in *Williams*, 122 F.4th at 89). Specifically:

Protected Activity. Defendants do not contest that Plaintiffs engaged in protected speech and political expression when they supported candidates disfavored by Defendants and associated with others to do so. Nor do they contest that Plaintiffs engaged in protected petitioning activity in seeking relief before this Court. *See generally* Doc. 183 at 12-13.

Causal Relationship. Defendants do not contest that the NCGA and Senator Hise redrew CD1 and CD3 in 2025 because of how Plaintiffs and others voted in 2024. While Defendants characterize this as mere "[p]olitics," Opp. 10, and an effort to "bring an additional Republican seat to the North Carolina's congressional delegation," Doc. 201-7 at 10:5-17, they do not contest that voters' protected expression of voting and supporting candidates that are disfavored by the NCGA majority was the basis for their being targeted for expulsion from their congressional district. Likewise, they do not dispute that

Defendants targeted Plaintiffs for exercising their right to petition by filing this lawsuit, which legislative leaders branded a "sue-until-blue scheme" that they must "defeat." Doc. 184-5. Defendants thus admit the causal relationship alleged here. *See* Doc. 183 at 13-15.

Adverse Action. Finally, Defendants do not dispute the facts establishing their adverse action against Plaintiffs and its chilling effect on Plaintiffs' constitutional rights to free speech, association, and to petition the government for a redress of grievances. Specifically, Defendants do not dispute that their actions severed Plaintiffs' relationship with their current representative, threatened their ability to vote for him in the next election, and disrupted their ability to associate with neighboring voters and communities with whom they have longstanding ties and common political interests. *See* Doc. 183 at 16-19. And they do not dispute that their actions will chill Plaintiffs from petitioning for a redress of grievances in the future. *Id.*

The undisputed facts supported by Plaintiffs' declarations, Docs. 183-4–11, prove that Defendants' actions have fundamentally chilled their speech and associational rights. The motion for a preliminary injunction as to Count 10 for unlawful retaliation in violation of the First Amendment can be granted without the need to resolve any factual disputes.

Turning next to Plaintiffs' right to petition the courts (Suppl. Count 11), Defendants do not dispute that their actions have frustrated Plaintiffs' ability to receive final judicial review of their pre-existing challenges to CD1. And in their filings, Defendants have essentially admitted to this fact: In addressing the issue of mootness, Defendants asserted both that Plaintiffs' existing challenges to CD1 were rendered moot by SB249 and that a "challenge to CD1 must be made in a new pleading[.]" Doc. 173 at 2. Defendants' proposal

of "Reopening of the Existing Trial Record" would have denied Plaintiffs supplemental discovery (with the exception of a single deposition). Doc. 189 at 5. These statements amount to a concession that Defendants' conduct, in redistricting mere weeks before the opening of candidate filing and before any ruling on the merits of Plaintiffs' *sub judice* claims, will frustrate judicial review of Plaintiffs' challenge to 2023 CD1 absent injunctive relief here.

Importantly, Plaintiffs do *not* contend that a given plan is frozen in place whenever a lawsuit is filed and until the suit is resolved. The Petition Clause is implicated here because this case presents extraordinary facts, in which the NCGA (1) doubled down on the alleged harms caused by the previous NCGA-drawn plan by further diluting Black voting strength in CD1, (2) at precisely the juncture when judicial review of the prior claims was ripe, and (3) with candidate filing looming. It is the NCGA's decision to heighten the already-alleged harm while insulating their actions from fulsome judicial review that violates Plaintiffs' right to petition the courts, not the mere fact that they amended the law.

At base, the legislature effectively claims a right to engage in continuous, retaliatory redistricting without any legitimate purpose in a manner that makes final judicial review of any given plan impossible. These actions risk creating the kind of perpetual "infinity loop" that courts have already rejected in the remedial context. *See* Doc. 183 at 22-25 (citing, *inter alia*, *Singleton v. Allen*, 690 F. Supp. 3d 1226, 1292-93 (N.D. Ala. 2023)). Defendants' actions thus frustrate Plaintiffs' rights to "appeal to courts and other forums established by the government for resolution of legal disputes," a right that is "in some sense the source of other fundamental rights, for petitions have provided a vital means for

citizens to request recognition of new rights and to assert existing rights against the sovereign." *Borough of Duryea*, 564 U.S. at 387, 397. Once again, the Court can protect this right, and enforce the preliminary injunction, without the need to resolve any disputed facts.

III. The Requested Injunction is Not Precluded by *Purcell*.

Defendants wrongly characterize Plaintiffs' request as a "mandatory injunction" (Opp. 5, 23) when it is nothing of the sort: Plaintiffs' requested injunctive relief seeks to enjoin the amendments in SB249 and thus revert the law back to the NCGA-drawn 2023 Congressional Plan. This *maintains* the status quo, and minimizes the voter confusion and disruption to the electoral process caused by Defendants' last-minute passage of SB249. Defendants do not otherwise substantively dispute that SB249 will cause irreparable harm to Plaintiffs and other Black voters, or argue that Defendants will bear any substantial burden by reverting to their own previously drawn districts.

Defendants otherwise rely on the *Purcell* doctrine. But the considerations outlined in *Purcell v. Gonzalez*, 549 U.S. 1 (2006), actually support the grant of injunctive relief here. Plaintiffs do not request that the Court "re-do a State's election laws in the period close to an election." *Merrill v. Milligan*, 142 S. Ct. 879, 881 (2022) (Kavanaugh, J., concurring). Plaintiffs instead request that the Court *preserve* the same congressional district lines as in 2024, *i.e.*, the lines currently in effect, resulting in *less* work for election administrators and *less* confusion for voters. *Contrast with Milligan*, 142 S. Ct. at 880-81 & n.1 (Kavanaugh, J., concurring). *Purcell* is no barrier to relief in these unique circumstances.

CONCLUSION

Plaintiffs' Motion for a Preliminary Injunction enjoining SB249 should be granted.

Dated: November 18, 2025

Respectfully submitted,

/s/ Hilary Harris Klein
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WORD CERTIFICATION

Pursuant to Local Rule 7.3(d)(1), the undersigned certifies that the word count for NAACP Plaintiffs' Reply in Support of Their Motion for a Preliminary Injunction is 3,119 words. The word count excludes the case caption, signature lines, cover page, and required certificates of counsel. In making this certification, the undersigned has relied upon the word count of Microsoft Word, which was used to prepare the brief.

/s/ Hilary Harris Klein
Hilary Harris Klein

CERTIFICATE OF SERVICE

I certify that on November 18, 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
Hilary Harris Klein

REPLY EXHIBIT A

Reply Expert Report of Anthony E. Fairfax

November 18, 2025

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

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

REPLY EXPERT REPORT OF ANTHONY E. FAIRFAX

on the 2025 Congressional Districts for the State of North Carolina

November 18, 2025

1. I previously submitted an Expert Report on October 31, 2025, addressing the changes made to North Carolina's congressional districts in 2025 (Doc. 183-2).

2. I was asked by Plaintiffs to respond to the expert report prepared by Dr. Michael Barber, submitted on November 14, 2025.

3. In footnote 3 of his November 2025 report, Dr. Barber incorrectly asserts that I have reported out "two different numbers" for municipal splits in the 2023 Congressional Plan (SL 2023-145) in my October 31, 2025, report. In so stating, Dr. Barber inaccurately compares Table 8 of my report to information in Appendix C (at PDF p. 76), which is a summary of Community of Interest splits from the Maptitude report for the 2023 Congressional Plan. Dr. Barber states that it is "unclear why there is a difference," but an examination of the appendix shows clearly why the numbers reported in Table 8 are accurate.

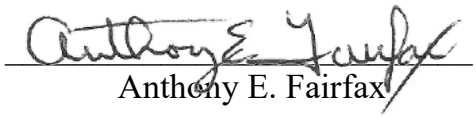
4. In Table 8 of my report, I have reported split municipalities and explained in Footnote 7 how I calculated splits of municipalities (cities, towns, and villages). By contrast, the Community of Interest report within Appendix C (starting PDF p. 65) includes cities, towns, villages, *and* what the Census and Maptitude refer to as Census Designated Places (CDPs). This can be seen clearly on PDF p. 65, which (for example) lists the split of the "Barker Ten Mile CDP." Thus, it is clear that this is not a municipality data report.

5. Since the 2025 Congressional Plan (S.B. 249) Criteria did not include CDP splits among its criteria, I only reported in Table 8 those splits of municipalities. I therefore did not include CDP splits when I reported numbers in Table 8. During my analysis, I produced two split data reports: one with only municipalities and another with municipalities and CDPs. However, when assembling my appendices, I included the split report with municipalities and CDPs.

6. I have now included in Appendix F the municipal split data report for the 2023 Congressional Plan (S.L. 2023-145) that only contains splits of municipalities and not with CDPs.

7. Dr. Barber does not appear to dispute my figures in Table 8, nor the fact that the changes to Congressional Districts 1 and 3 in S.B. 249 add one additional municipal split compared to the 2023 Congressional Plan, although he does note that the additional split is not populated. The narrative section and tables in my October 31, 2025, report thus remain accurate. My opinions and conclusions remain the same.

Dated: 11/18/25

Signed: 
Anthony E. Fairfax

Appendix F

SL 2023-145 Plan Maptitude Municipality Split
Report Omitting CDPs

User: **Tony Fairfax**
Plan Name: **NC CD SL 2023-145**
Plan Type: **NC Cong Districts**

Communities of Interest (Landscape, 11x8.5)

Thursday, October 30, 2025 11:56 AM

City/Town	District	Population	%
Archdale City	06	130	1.1
Archdale City	09	11,777	98.9
Beech Mountain Town	05	613	90.8
Beech Mountain Town	11	62	9.2
Candor Town	08	813	100.0
Candor Town	09	0	0.0
Cary Town	02	84,668	48.5
Cary Town	04	83,005	47.5
Cary Town	09	3,271	1.9
Cary Town	13	3,777	2.2
Charlotte City	08	63,098	7.2
Charlotte City	12	709,319	81.1
Charlotte City	14	102,162	11.7
Clemmons Village	06	13,930	65.8
Clemmons Village	10	7,233	34.2
Columbus Town	11	0	0.0
Columbus Town	14	1,060	100.0
Concord City	06	47,474	45.1
Concord City	08	57,766	54.9
Davidson Town	10	378	2.5
Davidson Town	14	14,728	97.5

Communities of Interest (Landscape, 11x8.5)

City/Town	District	Population	%
Durham City	02	269	0.1
Durham City	04	283,237	99.9
Fayetteville City	07	79,356	38.1
Fayetteville City	09	129,145	61.9
Fuquay-Varina Town	04	12,393	36.3
Fuquay-Varina Town	13	21,759	63.7
Garner Town	02	27,258	87.5
Garner Town	13	3,901	12.5
Greensboro City	05	224,189	75.0
Greensboro City	06	63,407	21.2
Greensboro City	09	11,439	3.8
Grifton Town	01	147	6.0
Grifton Town	03	2,301	94.0
Hickory City	05	32	0.1
Hickory City	10	43,379	99.7
Hickory City	14	79	0.2
High Point City	06	113,933	99.9
High Point City	09	126	0.1
Holly Springs Town	04	35,190	85.3
Holly Springs Town	13	6,049	14.7
Jamestown Town	06	7	0.2
Jamestown Town	09	3,661	99.8
Kannapolis City	06	52,324	98.5
Kannapolis City	08	790	1.5
Kenly Town	01	198	13.3

City/Town	District	Population	%
Kenly Town	13	1,293	86.7
Kernersville Town	05	82	0.3
Kernersville Town	06	26,367	99.7
Kernersville Town	10	0	0.0
King City	05	6,606	91.8
King City	10	591	8.2
Long View Town	10	4,353	85.6
Long View Town	14	735	14.5
Lumberton City	07	454	2.4
Lumberton City	08	18,571	97.6
Matthews Town	08	25,816	87.7
Matthews Town	12	3,619	12.3
Mebane City	04	3,171	17.8
Mebane City	09	14,626	82.2
Mint Hill Town	08	22,547	85.2
Mint Hill Town	12	3,903	14.8
Morrisville Town	02	10,457	35.3
Morrisville Town	04	19,173	64.7
Mount Olive Town	01	4,193	99.9
Mount Olive Town	03	5	0.1
Oxford City	01	8,485	98.3
Oxford City	13	143	1.7
Pineville Town	12	2,700	25.5
Pineville Town	14	7,902	74.5
Raleigh City	02	464,574	99.3

City/Town	District	Population	%
Raleigh City	04	1,559	0.3
Raleigh City	13	1,532	0.3
Red Springs Town	08	3,087	100.0
Red Springs Town	09	0	0.0
Rhodhiss Town	05	358	35.9
Rhodhiss Town	14	639	64.1
Rolesville Town	02	5,501	58.1
Rolesville Town	13	3,974	41.9
Rutherford College Town	05	0	0.0
Rutherford College Town	14	1,226	100.0
Seven Devils Town	05	275	87.9
Seven Devils Town	11	38	12.1
Summerfield Town	05	8,442	77.1
Summerfield Town	09	2,509	22.9
Surf City Town	03	334	8.6
Surf City Town	07	3,533	91.4
Thomasville City	06	26,662	98.1
Thomasville City	09	521	1.9
Tobaccoville Village	05	0	0.0
Tobaccoville Village	10	2,578	100.0
Wake Forest Town	02	32,623	68.5
Wake Forest Town	13	14,978	31.5
Walkertown Town	06	1,081	19.0
Walkertown Town	10	4,611	81.0
Wallace Town	03	3,413	100.0

Communities of Interest (Landscape, 11x8.5)

City/Town	District	Population	%
Wallace Town	07	0	0.0
Wendell Town	02	9,765	99.7
Wendell Town	13	28	0.3
Winston-Salem City	06	33,949	13.6
Winston-Salem City	10	215,596	86.4
Zebulon Town	02	4,668	67.6
Zebulon Town	13	2,235	32.4

City/Town	-- Listed by District	
	Population	%
Grifton Town (part)	147	6.0
Kenly Town (part)	198	13.3
Oxford City (part)	8,485	98.3
District 01 Totals	**307,611**	
Cary Town (part)	84,668	48.5
Durham City (part)	269	0.1
Garner Town (part)	27,258	87.5
Morrisville Town (part)	10,457	35.3
Raleigh City (part)	464,574	99.3
Rolesville Town (part)	5,501	58.1
Wake Forest Town (part)	32,623	68.5
Zebulon Town (part)	4,668	67.6
District 02 Totals	**659,218**	
Grifton Town (part)	2,301	94.0
Mount Olive Town (part)	5	0.1
Surf City Town (part)	334	8.6
District 03 Totals	**347,527**	

	Population	%
Cary Town (part)	83,005	47.5
Fuquay-Varina Town (part)	12,393	36.3
Holly Springs Town (part)	35,190	85.3
Mebane City (part)	3,171	17.8
Morrisville Town (part)	19,173	64.7
Raleigh City (part)	1,559	0.3
District 04 Totals	**593,960**	
Beech Mountain Town (part)	613	90.8
Greensboro City (part)	224,189	75.0
Hickory City (part)	32	0.1
Kernersville Town (part)	82	0.3
King City (part)	6,606	91.8
Rhodhiss Town (part)	358	35.9
Rutherford College Town (part)	0	0.0
Seven Devils Town (part)	275	87.9
Summerfield Town (part)	8,442	77.1
Tobaccoville Village (part)	0	0.0
District 05 Totals	**386,989**	

	Population	%
Archdale City (part)	130	1.1
Clemmons Village (part)	13,930	65.8
Concord City (part)	47,474	45.1
Greensboro City (part)	63,407	21.2
Jamestown Town (part)	7	0.2
Kannapolis City (part)	52,324	98.5
Thomasville City (part)	26,662	98.1
Walkertown Town (part)	1,081	19.0
Winston-Salem City (part)	33,949	13.6
District 06 Totals	**473,633**	
Fayetteville City (part)	79,356	38.1
Lumberton City (part)	454	2.4
Surf City Town (part)	3,533	91.4
Wallace Town (part)	0	0.0
District 07 Totals	**333,761**	
Charlotte City (part)	63,098	7.2
Concord City (part)	57,766	54.9
Kannapolis City (part)	790	1.5
Lumberton City (part)	18,571	97.6
Matthews Town (part)	25,816	87.7
Mint Hill Town (part)	22,547	85.2
District 08 Totals	**471,095**	

	Population	%
Archdale City (part)	11,777	98.9
Candor Town (part)	0	0.0
Cary Town (part)	3,271	1.9
Fayetteville City (part)	129,145	61.9
Greensboro City (part)	11,439	3.8
High Point City (part)	126	0.1
Mebane City (part)	14,626	82.2
Red Springs Town (part)	0	0.0
Summerfield Town (part)	2,509	22.9
Thomasville City (part)	521	1.9
District 09 Totals	**411,757**	
Clemmons Village (part)	7,233	34.2
Davidson Town (part)	378	2.5
Kernersville Town (part)	0	0.0
King City (part)	591	8.2
Long View Town (part)	4,353	85.6
Walkertown Town (part)	4,611	81.0
Winston-Salem City (part)	215,596	86.4
District 10 Totals	**425,156**	
Beech Mountain Town (part)	62	9.2
Columbus Town (part)	0	0.0
Seven Devils Town (part)	38	12.1
District 11 Totals	**214,219**	

	Population	%
Charlotte City (part)	709,319	81.1
Matthews Town (part)	3,619	12.3
Mint Hill Town (part)	3,903	14.8
Pineville Town (part)	2,700	25.5
District 12 Totals	**719,541**	
Cary Town (part)	3,777	2.2
Fuquay-Varina Town (part)	21,759	63.7
Garner Town (part)	3,901	12.5
Holly Springs Town (part)	6,049	14.7
Kenly Town (part)	1,293	86.7
Oxford City (part)	143	1.7
Raleigh City (part)	1,532	0.3
Rolesville Town (part)	3,974	41.9
Wake Forest Town (part)	14,978	31.5
Wendell Town (part)	28	0.3
Zebulon Town (part)	2,235	32.4
District 13 Totals	**210,167**	
Charlotte City (part)	102,162	11.7
Davidson Town (part)	14,728	97.5
Hickory City (part)	79	0.2
Long View Town (part)	735	14.5
Pineville Town (part)	7,902	74.5
Rhodhiss Town (part)	639	64.1
Spencer Mountain Town	0	0.0
District 14 Totals	**462,971**	

Summary Statistics

Number of City/Town not split	505
Number of City/Town split	48
Number of City/Town split in 2	42
Number of City/Town split in 3	5
Number of City/Town split in 4	1
Total number of splits	103