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

SECOND DECLARATION OF HILARY HARRIS KLEIN

I, Hilary Harris Klein, declare as follows:

1. I am more than 18 years of age, am of sound mind, and am otherwise competent to give this Declaration.

2. I am counsel for the North Carolina NAACP, Common Cause, Mitzi Reynolds Turner, Dawn Daly-Mack, Hollis Briggs, Corine Mack, Calvin Jones, Linda Sutton, and Syene Jasmin ("NAACP Plaintiffs") in the above-captioned action.

3. This declaration is based on my personal knowledge and/or my review of correspondence and documents produced in this case.

4. I provided an initial Declaration in support of NAACP Plaintiffs' Motion for a Protective Order, also dated October 4, 2024.

5. At the time I drafted the content of that Declaration, I had not yet received Legislative Defendants' 30(b)(6) Notices of Depositions. Accordingly, I stated I had not received any such notices in paragraph 29 of that Declaration.

6. While I was finalizing the Motion for a Protective Order and its accompanying materials, including the declaration exhibits, Legislative Defendants did transmit (at 3:38pm) two 30(b)(6) Notices of Deposition. That updated email is reflected as Exhibit E to my prior declaration, but when the exhibit E document was updated I erred in not also updating my initial Declaration as well.

7. Accordingly, I submit this Second Declaration to confirm to the Court that, at 3:38pm this afternoon, I did receive two Notices of Deposition for Plaintiffs Common Cause and the North Carolina NAACP. I apologize for any confusion my first Declaration may have caused to the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 4, 2024.

/s/ *Hilary Harris Klein*
Hilary Harris Klein

CERTIFICATE OF SERVICE

I certify that on October 4, 2024, I electronically filed the foregoing and its exhibits 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