

**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

NOTICE OF FILING
OF ADDENDUM TO THE PROTECTIVE ORDER PROVIDING FOR
ATTORNEYS EYES ONLY DESIGNATION

NOW COME NAACP Plaintiffs, by and through counsel, to provide notice to the Court that pursuant to Paragraph 42 of the Protective Order, Doc. 55, which allows the parties to modify by agreement the Protective Order, the parties have agreed and executed an Addendum to the Protective Order providing for an “Attorneys Eyes Only” designation.

The Addendum has been filed as an Exhibit to this Notice.

Dated: November 20, 2024

Respectfully submitted,

/s/ Hilary Harris Klein

Hilary Harris Klein

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*Appearing in this matter by Special Appearance pursuant to L-R 83.1(d)

CERTIFICATE OF SERVICE

I certify that on November 24, 2024, 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

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ADDENDUM TO PROTECTIVE ORDER

WHEREAS Paragraph 42 of the Protective Order in this matter, Doc. 55, allows the parties to modify by agreement the Protective Order; and

WHEREAS the parties agree to this Addendum to the Protective Order;

THEREFORE, the parties, by and through their respective counsel, agree to the following additional terms:

XII. ATTORNEYS EYES ONLY DESIGNATION

43. The Parties may designate any Discovery Material that is already designated as “Confidential” with the additional designation as “Attorneys Eyes Only.” This “Confidential” and “Attorneys Eyes Only” material shall be treated under the same terms as those designated “Confidential” *except* those in paragraph 20. Instead, for documents with the additional designation of “Attorneys Eyes Only,” the following shall apply in lieu of those in paragraph 20:

44. Unless otherwise ordered by the Court or agreed to in writing by the Producing Party, Discovery Material designated as “Attorneys Eyes Only” may only be used for the purpose of the Litigation and may not be disclosed by a Receiving Party to any person except the following:

- A. The Receiving Party’s counsel, together with the partners, associates, contract attorneys, secretaries, paralegals, and employees of such counsel, only to the extent reasonably necessary to render professional services in the litigation, and for use exclusively in these actions (and for no other purpose);
- B. Judges, court reporters, court personnel, and videographers present at trial, hearings, arguments, depositions and any other judicial proceedings held in this litigation;
- C. Persons shown on the face of the document to have authored or received it;

- D. During a deposition, to a current employee of the Producing Party, or who has been designated by the Producing Party to appear on behalf of the Producing Party at a deposition;
- E. Consultants or experts retained by the Receiving Party to assist in the Litigation, provided that the disclosure is only to the extent necessary to perform such work; and provided that such consultant or expert has executed the Acknowledgment; and
- F. Contractors, vendors, and technicians retained for the purpose of organizing, filing, coding, converting, storing, or retrieving data or designing database programs for handling Protected Material.

Executed this the 19th day of November, 2024.

/s/Phillip J. Strach

Phillip J. Strach

/s/Hilary Harris Klein

Hilary Harris Klein

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DEPARTMENT OF JUSTICE**

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