

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

FILED

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

Case No. 19 CVS 12667

2019 NOV -6 A 11:12

REBECCA HARPER, *et al.* )  
*Plaintiffs,* )  
 )  
 v. )  
 )  
 REPRESENTATIVE DAVID R. LEWIS, *et al.* )  
*Defendants.* )  
 )  
 )  
 )  
 )  
 )  
 )

---

**ANSWER**

Defendants Representative David R. Lewis, Senator Ralph Hise, Senator Warren Daniel, Senator Paul Newton, Speaker Timothy K. Moore, and President Pro Tempore of the North Carolina Senate Philip E. Berger (Defendants) answer plaintiffs' Complaint as follows.

**FIRST DEFENSE**

None of the plaintiffs have standing to bring this civil action.

**SECOND DEFENSE**

Plaintiffs' current action is barred by the doctrine of laches.

**THIRD DEFENSE**

Plaintiffs are seeking a remedy that would violate Section 2 of the Voting Rights Act, and the Fourteenth and Fifteenth Amendments to the United States Constitution.

#### **FOURTH DEFENSE**

This court is barred by Article I, § 4 of the United States Constitution from applying to Congressional districting the test for legislative districting adopted by the three-judge panel in *Common Cause v. Lewis*.

#### **FIFTH DEFENSE**

The actual plaintiffs in this case are barred by the doctrine of claim preclusion or res judicata from asserting these claims.

#### **SIXTH DEFENSE**

Any decision by the Court to apply to Congressional districting the standardless test adopted in *Common Cause v. Lewis* will unduly burden both the associational rights and the right to vote of the Legislative Defendants and their supporters in violation of the First and Fourteenth Amendments to the United States Constitution.

#### **SEVENTH DEFENSE**

Any decision by the Court to apply to Congressional districting the standardless test adopted in *Common Cause v. Lewis* will result in an improper judicial amendment of the North Carolina Constitution in violation of Article XIII, Sections 1-4 of the North Carolina Constitution.

#### **EIGHTH DEFENSE**

Defendants answer the specific allegations of plaintiffs' complaint as follows:

1. Defendants admit that the statements by the Superior Court in *Common Cause v. Lewis* speak for themselves. In all other respects, defendants deny the allegations of paragraph 1.

2. Defendant admit that to the extent they are accurately quoted statements by Representative Lewis that the statements speak for themselves. In all other respects, Defendants deny the allegations of paragraph 2.

3. Defendants deny the allegations of paragraph 3.

4. Defendants admit that the cited court opinions speak for themselves. In all other respects, Defendants deny the allegations of paragraph 4.

5. Defendants admit that statements by the Superior Court in *Common Cause v. Lewis* speak for themselves. In all other respects, Defendants deny the allegations of paragraph 5.

## **“PARTIES”**

### **“A. PLAINTIFFS”**

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Oseroff. In all other respects, defendants deny the allegations of paragraph 6.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Harper. In all other respects, defendants deny the allegations of paragraph 7.

8. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Rumph. In all other respects, defendants deny the allegations of paragraph 8.

9. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Balla. In all other respects, defendants deny the allegations of paragraph 9.

10. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Crews. In all other respects, defendants deny the allegations of paragraph 10.

11. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Quick. In all other respects, defendants deny the allegations of paragraph 11.

12. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Cohen. In all other respects, defendants deny the allegations of paragraph 12.

13. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Rush. In all other respects, defendants deny the allegations of paragraph 13.

14. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Dunn. In all other respects, defendants deny the allegations of paragraph 14.

15. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Peters. In all other respects, defendants deny the allegations of paragraph 15.

16. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Gates. In all other respects, defendants deny the allegations of paragraph 16.

17. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Barnes. In all other respects, defendants deny the allegations of paragraph 17.

18. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Brien. In all other respects, defendants deny the allegations of paragraph 18.

19. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations related to Plaintiff Brown. In all other respects, defendants deny the allegations of paragraph 19.

**“B. DEFENDANTS”**

20. Defendants admit the allegations of paragraph 20.

21. Defendants admit the allegations of paragraph 21.

22. Defendants admit the allegations of paragraph 22.

23. Defendants admit the allegations of paragraph 23.

24. Defendants admit the allegations of paragraph 24.

25. Defendants admit the allegations of paragraph 25.

26. Defendants admit the allegations of paragraph 26.

27. Defendants admit the allegations of paragraph 27.

28. Defendants admit the allegations of paragraph 28.

29. Defendants admit the allegations of paragraph 29.

30. Defendants admit the allegations of paragraph 30.

31. Defendants admit the allegations of paragraph 31.

**“JURISDICTION AND VENUE”**

32. Defendants deny the allegations of paragraph 32.

33. Defendants deny the allegations of paragraph 33.

34. Defendants deny the allegations of paragraph 34.

**“FACTUAL ALLEGATIONS”**

**“A. National Republican Party Officials Target North Carolina for partisan Gerrymandering Prior to 2010 Election”**

35. Defendants admit that the Republican Leadership Committee supported efforts to elect Republicans in 2010 and to try to achieve Republican majorities in the legislature. Defendants also admit that written statements by RSLC speak for themselves. In all other respects, defendants deny the allegations of paragraph 35.

36. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 36.

37. Defendants are without knowledge and information sufficient to form a belief as to the truth of the allegations that RSLC donated \$1.25 million to Real Jobs NC or that “this represented three-quarters of all total spending by all independent groups in North Carolina on 2010 state legislative races.” In all other respects, defendants deny the allegations of paragraph 37.

38. Defendants admit that Republican candidates constituted a majority in the NC House and Senate after the 2010 General Election. In all other respects, defendants deny the allegations of paragraph 38.

**“B. Republican Mapmakers Create the 2011 Plan From Party Headquarters with the Intent to Advantage Republicans and Disadvantage Democrats”**

39. Defendants admit the allegations of paragraph 39.

40. Defendants are without knowledge or information sufficient to form a belief on whether Dr. Hofeller “served on a Redmap redistricting team.” Defendants deny that “Dr. Hofeller and his team drew the 2011 plan.” Defendants admit that like the Democrats, Republicans drew maps at their party headquarters or at other non-public locations. In all other respects, defendants admit the allegations of paragraph 40.

41. Defendants admit that Dr. Hofeller was hired to assist Sen. Rucho and Rep. Lewis, that Democratic members of the General Assembly used their own consultants to draw maps, that Dr. Hofeller was not made available to Democratic members, and that the consultants used by Democratic members were not made available to Republican members. In all other respects, defendants deny the allegations of paragraph 41.

42. Defendants admit that Rep. Lewis and Sen. Rucho discussed the criteria Dr. Hofeller should follow and that Dr. Hofeller’s testimony speaks for itself. In all other respects, defendants deny the allegations of paragraph 42.

43. Defendants admit that the testimony of Dr. Hofeller speaks for itself. In all other respects, defendants deny the allegations of paragraph 43.

44. Defendants admit that the election results for the 2012 General Election speaks for itself. In all other respects, defendants deny the allegations of paragraph 44.

**“C. Legislative Defendants Create the 2011 Plan with the Explicit Partisan Goal of Guaranteeing a 10-3 Republican Advantage in Congressional Seats”**

45. Defendants admit that the decision in *Harris v. McCrory* speaks for itself. In all other respects, defendants deny the allegations of paragraph 45.

46. Defendants admit that in 2016 there were 74 Republican Representatives and 34 Republican Senators and that Rep. Lewis and Sen. Rucho served as chairs of the redistricting committees. In all other respects, defendants deny the allegations of paragraph 46.

47. Defendants admit that Rep. Lewis and Sen. Rucho discussed criteria Dr. Hofeller should follow with Dr. Hofeller at Dr. Hofeller’s home and that the testimony of Rep. Lewis and Dr. Hofeller speaks for itself. In all other respects, defendants deny the allegations of paragraph 47.

48. Defendants admit that Dr. Hofeller’s testimony speaks for itself. In all other respects, defendants deny the allegations of paragraph 48.

49. Defendants admit that Dr. Hofeller’s testimony speaks for itself. In all other respects, defendants deny the allegations of paragraph 49.

50. Defendants admit that Dr. Hofeller’s testimony speaks for itself. In all other respects, defendants deny the allegations of paragraph 50.

51. Defendants admit that the testimony of Dr. Hofeller and Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 51.



52. Defendants admit that the testimony of Dr. Hofeller and Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 52.

53. Defendants admit that the testimony of Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 53.

54. Defendants admit that the Joint Committee consisted of 25 Republicans and 12 Democrats. In all other respects, defendants deny the allegations of paragraph 54.

55. Defendants admit that the Joint Committee held a public hearing on February 15, 2016. In all other respects, defendants deny the allegations of paragraph 55.

56. Defendants admit the allegations of paragraph 56.

57. Defendants admit that the partisan advantage criterion speaks for itself. In all other respects, defendants deny the allegations of paragraph 57.

58. Defendants admit that the statement by Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 58.

59. Defendants admit that the statement by Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 59.

60. Defendants admit that the political data criterion speaks for itself. In all other respects, defendants deny the allegations of paragraph 60.

61. Defendants admit that the statement by Rep. Lewis speaks for itself. In all other respects, defendants deny the allegations of paragraph 61.

62. The Defendants admit that the 2016 Adopted Criteria speaks for itself. In all other respects, defendants deny the allegations of paragraph 62.

63. Defendants admit that statements by Rep. Lewis and Dr. Hofeller speak for themselves, that the political data and Partisan Advantage criteria were adopted by party-line votes, and that the other criteria of the 2016 Adopted Criteria were adopted on a bipartisan basis. In all other respects, defendants deny the allegations of paragraph 63.

64. Defendants deny that Dr. Hofeller “downloaded the 2016 Plan” into a state legislative computer. In all other respects, defendants admit the allegations of paragraph 64.

65. Defendants admit that consistent with the General Assembly’s normal practices, Democratic members of the Joint Committee were not allowed to “consult” with Dr. Hofeller or given access to the state legislative computer on which Dr. Hofeller downloaded a plan he had drawn on his home computer. In all other respects, defendants deny the allegations of paragraph 65.

66. Defendants admit that the testimony by Dr. Hofeller speaks for itself. In all other respects, defendants deny the allegations of paragraph 66.

67. Defendants admit that the statements by Sen. Rucho and Rep. Lewis speak for themselves and that the Joint Committee adopted the proposed 2016 Plan in a party-line vote. In all other respects, defendants deny the allegations of paragraph 67.

68. Defendants admit that the statement by Rep. Lewis speak for itself. In all other respects, defendants deny the allegations of paragraph 68.

69. Defendants admit the allegations of paragraph 69.

70. Defendants admit that the testimony by Sen. Rucho speaks for itself. In all other respects, defendants deny the allegations of paragraph 70.

**“D. The 2016 Plan Achieve Its Intended Effect of Propelling Ten Republican Congressional Candidates to Electoral Victory Every Two Years.”**

71. Defendants deny the allegations of paragraph 71.

72. Defendants admit that the election results for the 2016 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 72.

73. Defendants admit that the election results for the 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 73.

74. Defendants admit that the election results for the 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 74.

75. Defendants admit that the election results for the 2016 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 75.

76. Defendants deny the allegations of paragraph 76.

**“E. The 2016 Plan Pushes and Cracks Democratic Voters in Every District”**

77. Defendants deny the allegations of paragraph 77.

**“Congressional District 1”**

78. Defendants deny the allegations of paragraph 78.

79. Defendants admit that the district lines for CD 1 speak for themselves. In all other respects, defendants deny the allegations of paragraph 79.

80. Defendants admit that the district lines for CD 1 speak for themselves. In all other respects, defendants deny the allegations of paragraph 80.

81. Defendants admit that the district lines for CD 1 speak for themselves. In all other respects, defendants deny the allegations of paragraph 81.

82. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 82.

#### **“Congressional District 2”**

83. Defendants admit that the district lines for CD 2 speak for themselves. In all other respects, defendants deny the allegations of paragraph 83.

84. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 84.

#### **“Congressional District 3”**

85. Defendants admit that the district lines for CD 3 speak for themselves. In all other respects, defendants deny the allegations of paragraph 85.

86. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 86.

### **“Congressional District 4”**

87. Defendants admit that the district lines for CD 4 speak for themselves. In all other respects, defendants deny the allegations of paragraph 87.

88. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 88.

### **“Congressional District 5”**

89. Defendants admit that the district lines for CD 5 speak for themselves. In all other respects, defendants deny the allegations of paragraph 89.

90. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 90.

### **“Congressional District 6”**

91. Defendants admit that the district lines for CD 6 speak for themselves. In all other respects, defendants deny the allegations of paragraph 91.

92. Defendants admit that district lines for CD 6 and 13 speak for themselves. In all other respects, defendants deny the allegations of paragraph 92.

93. Defendants admit that the district lines for CD 6 and 13 speak for themselves. In all other respects, defendants deny the allegations of paragraph 93.

94. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 94.

**“Congressional District 7”**

95. Defendants admit that the district lines for CD 7 speak for themselves. In all other respects, defendants deny the allegations of paragraph 95.

96. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 96.

**“Congressional District 8”**

97. Defendants admit that the district lines for CD 8 speak for themselves. In all other respects, defendants deny the allegations of paragraph 97.

98. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 98.

**“Congressional District 9”**

99. Defendants admit that the district lines for CD 9 speak for themselves. In all other respects, defendants deny the allegations of paragraph 99.

100. Defendants admit that the election results for the 2018 General Election and 2019 Special Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 100.

**“Congressional Districts 10 and 11”**

101. Defendants admit that the district lines for CD 10 and 11 speak for themselves. In all other respects, defendants deny the allegations of paragraph 101.

102. Defendants admit that the district lines for CD 10 and 11 speak for themselves. In all other respects, defendants deny the allegations of paragraph 102.

103. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 103.

**“Congressional District 12”**

104. Defendants admit that the district lines for CD 12 speak for themselves. In all other respects, defendants deny the allegations of paragraph 104.

105. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 105.

**“Congressional District 13”**

106. Defendants admit that the district lines for CD 13 speak for themselves. In all other respects, defendants deny the allegations of paragraph 106.

107. Defendants admit that the election results for the 2016 and 2018 General Election speak for themselves. In all other respects, defendants deny the allegations of paragraph 107.

**“F. Legislative Defendants Did Not Draw Any District in the 2011 Congressional Map to Comply with the Voting Rights Act”**

108. Defendants admit that the testimony by Dr. Hofeller speaks for itself. In all other respects, defendants deny the allegations of paragraph 108.

109. Defendants admit that the 2016 Adopted Criteria speaks for itself. In all other respects, defendants deny the allegations of paragraph 109.

110. Defendants admit that race was not used as a criterion to draw the 2016 Plan, that no one provided any evidence of legally significant racially polarized voting during the legislative sessions related to the 2016 Plan, and that the testimony or statements by Rep. Lewis and Sen. Rucho speak for themselves. In all other respects, defendants deny the allegations of paragraph 110.

111. Defendants admit that the named plaintiffs in the case of *Rucho v. Common Cause* are included in the North Carolina Democratic Party and Common Cause and that the claims asserted in that case were under the federal constitution. In all other respects, defendants deny the allegations of paragraph 111.

112. Defendants admit that the decision by the district court in *Common Cause v. Rucho* speaks for itself. In all other respects, defendants deny the allegations of paragraph 112.

113. Defendants admit that the decision by the United States Supreme Court in *Common Cause v. Rucho* speaks for itself. In all other respects, defendants deny the allegations of paragraph 113.

114. Defendants admit that the decision by the United States Supreme Court in *Common Cause v. Rucho* speaks for itself. In all other respects, defendants deny the allegations of paragraph 114.



**“H. The Supreme Court Strikes Down North Carolina’s State Legislative Maps Under the North Carolina Constitution”**

115. Defendants admit that the decision by the three-judge court in *Common Cause v. Lewis* speaks for itself. In all other respects, defendants deny the allegations of paragraph 115.

116. Defendants admit that the decision by the three-judge court in *Common Cause v. Lewis* speaks for itself. In all other respects, defendants deny the allegations of paragraph 116.

117. Defendants admit that the decision by the three-judge court in *Common Cause v. Lewis* speaks for itself. In all other respects, defendants deny the allegations of paragraph 117.

118. Defendants admit that the decision by the three-judge court in *Common Cause v. Lewis* speaks for itself. In all other respects, defendants deny the allegations of paragraph 118.

119. Defendants deny the allegations of paragraph 119.

**“COUNT ONE”**

**“VIOLATION OF NORTH CAROLINA CONSTITUTION’S**

**FREE ELECTION CLAUSE ART. § 10”**

120. Defendants incorporate by reference their responses to paragraphs 1-119.

121. Defendants admit that Article I, Section 10 of the North Carolina Constitution speaks for itself. In all other respects, defendants deny the allegations of paragraph 121.

122. Defendants admit that the quoted statement speaks for itself. In all other respects, defendants deny the allegations of paragraph 122.

123. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 123.

124. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 124.

125. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 125.

126. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 126.

127. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 127.

128. Defendants admit that statements by legislative defendants about the 2016 Adopted Criteria speak for themselves. In all other respects, defendants deny the allegations of paragraph 128.

## **“COUNT TWO”**

### **“VIOLATION OF NORTH CAROLINA CONSTITUTION’S EQUAL**

#### **PROTECTION CLAUSE, ART. I § 19”**

129. Defendants incorporate by reference their responses to paragraphs 1-128.

130. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 130.

131. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 131.

132. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 132.

133. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 133.

134. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 134.

135. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 135.

### **“COUNT THREE”**

#### **“VIOLATION OF NORTH CAROLINA CONSTITUTION’S FREEDOM OF SPEECH AND FREEDOM OF ASSEMBLY CLAUSES I ART. I §§ 12 AND 14”**

136. Defendants incorporate by reference their responses to paragraphs 1-135.

137. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 137.

138. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 138.

139. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 139.

140. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 140.

141. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 141.

142. Defendants admit that the quoted material speaks for itself. In all other respects, defendants deny the allegations of paragraph 142.

143. Defendants deny the allegations of paragraph 143.

144. Defendants deny the allegations of paragraph 144.

### **PRAYER FOR RELIEF**

WHEREFORE, Defendants request that the Court:

1. dismiss all of plaintiffs' claims and enter judgment for the defendants;
2. award defendants their costs;
3. grant such other relief as the court may find just and equitable.

Respectfully submitted this the 30th day of October, 2019.

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By:   
\_\_\_\_\_

Phillip J. Strach  
N.C. State Bar No. 29456  
Thomas A. Farr  
N.C. State Bar No. 10871  
Michael McKnight  
N.C. State Bar No. 36932  
Alyssa M. Riggins  
N.C. State Bar No. 52366  
phil.strach@ogletreedeakins.com  
tom.farr@ogletreedeakins.com  
michael.mcknight@ogletreedeakins.com  
alyssamriggins@ogletreedeakins.com  
4208 Six Forks Road, Suite 1100  
Raleigh, North Carolina 27609  
Telephone: (919) 787-9700  
Facsimile: (919) 783-9412  
*Counsel for the Legislative Defendants*

BAKER & HOSTETLER, LLP

E. Mark Braden\*  
(DC Bar #419915)  
Katherine McKnight\*  
(DC Bar # 99456)  
Washington Square, Suite 1100  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5403  
Telephone: (202) 861-1500  
Facsimile: (202) 861-1783  
*Counsel for Legislative Defendants*  
*\*appearing Pro Hac Vice*

## CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document was served upon the parties via electronic mail:

Burton Craige  
Narendra K. Ghosh  
Paul E. Smith  
100 Europa Dr., Suite 420  
Chapel Hill, NC 27517  
(919) 942-5200

*Counsel for Plaintiffs*

Paul Cox  
Stephanie Brennan  
North Carolina Department of Justice  
114 W. Edenton St  
Raleigh, NC 27603  
(919) 716-6932  
pcox@ncdoj.gov

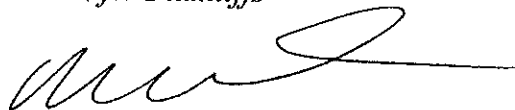
*Counsel for the State Board of Elections*

R. Stanton Jones  
David P. Gersch  
Elisabeth S. Theodore  
Daniel F. Jacobson  
601 Massachusetts Ave., NW  
Washington, DC 20001-3761  
(202) 942-5000  
Stanton.jones@arnoldporter.com

Marc Elias  
Aria C. Branch  
700 13th Street NW  
Washington, DC 20005-3960  
(202) 654-6200  
melias@perkinscoie.com

Agha Khanna  
1201 Third Avenue  
Suite 4900  
Seattle, WA 98101-3099  
(206) 359-8000

*Counsel for Plaintiffs*



Alyssa M. Riggins (N.C. Bar No. 52366)  
4208 Six Forks Road, Suite 1100  
Raleigh, NC 27609  
Telephone: 919.787.9700  
Facsimile: 919.783.9412  
Alyssa.riggins@ogletree.com  
*Attorneys for Legislative Defendants*

This 30th day of October, 2019.