

Exhibit 7

Alyssa Riggins

From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Sent: Tuesday, December 14, 2021 12:21 PM
To: 'McKnight, Katherine L.'; Alyssa Riggins; 'Feldman, Stephen'
Cc: Phil Strach; Tom Farr; John Branch; Braden, E. Mark; Raile, Richard; 'Brennan, Stephanie'; 'Majmundar, Amar'; 'tsteed@ncdoj.gov'; 'Burton Craige'; 'Narendra Ghosh'; 'Paul Smith'; 'melias@elias.law'; 'abranche@elias.law'; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton; Callahan, Sam; 'Doerr, Adam'; 'Zimmerman, Erik'; 'Hirsch, Sam'; 'Amunson, Jessica Ring'; 'Kali Bracey'; 'Schauf, Zachary C.'; 'Mittal, Urja R.'
Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

Thank you very much for sending the incumbent addresses.

We understood the Court's order from yesterday to require us to produce expert materials with the reports on the 23rd. We will certainly honor our agreement — which was to voluntarily produce PI-related materials earlier *if* you agree to a protective order — but you told us yesterday that you wouldn't agree and would oppose such an order, which is why we didn't produce them yesterday. We have not changed our position, but we do not plan to voluntarily produce source code and other materials relating to PI-stage reports if there is any risk that those materials won't be subject to a protective order.

We intend to move the court, as early as today, for entry of the same protective order to which the parties agreed (and that the panel entered) in Common Cause. We did not understand your addition, which appears to allow parties to unilaterally designate as confidential information that has nothing to do with them and in which they have no protectable interest.

Of course, you retain the right to oppose entry of the order. If you oppose and the Court declines to enter our proposed protective order, we will produce all the expert materials that the Court's scheduling order requires us to produce, but we won't plan to voluntarily produce extra materials such as the PI materials absent a protective order.

Thanks,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>
Sent: Tuesday, December 14, 2021 9:57 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranche@elias.law' <abranche@elias.law>; zzz.External.Imadduri@elias.law <Imadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring'

<JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Thanks for your e-mail, Elisabeth. Last Thursday we asked for Plaintiffs' source code data for Plaintiffs' PI expert reports and were told that Harper Plaintiffs would produce it with a protective order. We asked that it be produced by yesterday and Harper Plaintiffs agreed. Yesterday morning, we agreed to Plaintiffs' protective order with minor revision, and the requirement that Harper Plaintiffs seek a Court-ordered protective order after production, but Harper Plaintiffs have not yet produced their experts' PI source code. We ask for the courtesy of notice if Harper Plaintiffs have changed their position and no longer intend to produce their experts' PI source code. If we do not hear from you by 2pm today, we will need to seek Court assistance in resolving this dispute.

Zach, for NCLCV Plaintiffs, we understood you were waiting to see the Court's scheduling order to produce. Now that you have the scheduling order and see the Court's requirement for the production of expert source code, will you agree to produce Dr. Duchin's PI source code today? We ask that you confirm NCLCV Plaintiffs' position on producing Dr. Duchin's PI source code by 2pm today. We hope to come to an agreement on this issue but may need to seek Court assistance in resolving this dispute.

As for incumbent addresses, unlike Harper Plaintiffs' agreement to produce information by yesterday, we never promised production by Monday. We received Harper Plaintiffs' written request on Friday afternoon and relayed it that afternoon to Central Staff in the General Assembly. It bears noting that Central Staff are non-partisan staff of the legislative body. Central Staff let us know yesterday morning that your Friday afternoon request would be fulfilled within a few hours and we relayed that information to you noting that this was our belief of timing but that we could not estimate with further certainty. Regardless, attached please find the incumbent address list.

We look forward to your responses.

Kate

Katherine L. McKnight
Partner

BakerHostetler

Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Monday, December 13, 2021 11:59 PM

To: McKnight, Katherine L. <kmcknight@bakerlaw.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>

'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abbranch@elias.law' <abbranch@elias.law>; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

Thanks for your response. We too hope to avoid motion practice on the issue of the incumbent addresses, but it has now been 10 hours since you advised us that you hoped to send the addresses in "a few hours," and 4 days since we requested these addresses. As you know, these addresses are essential to our expert analysis, and time is short. Please see the attached first set of interrogatories from the Harper plaintiffs to the legislative defendants, which formally request the incumbent addresses by 3pm tomorrow. We will move at that time if we do not hear from you sooner.

I note that we know that this information has already been compiled by the General Assembly based on public documents. The StatPack for the enacted Senate plan (https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2021/SL%202021-173%20Senate%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: NC Senate - 9/20/2021." The StatPack for the enacted House plan (https://www.ncleg.gov/Files/GIS/Plans_Main/House_2021/SL%202021-175%20House%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: NC House - 10/01/2021." And the StatPack for the congressional plan (https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2021/SL%202021-174%20Congress%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: Congress - 9/22/2021."

Thanks,
Elisabeth

Thank you,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>

Sent: Monday, December 13, 2021 1:58 PM

To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>;

'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>;

'abbranch@elias.law' <abbranch@elias.law>; zzz.External.Imadduri@elias.law <Imadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Thanks for your e-mails, Elisabeth and Zach.

Legislative Defendants cannot agree to a protective order other than under the arrangement described below. Do Plaintiffs need an additional day or two to file a motion for protective order? We can work with Plaintiffs on that point.

Elisabeth, thank you for working to accommodate our request for backup material today. If the Court allows Plaintiffs to amend their expert reports, which, to be clear, we do not think is appropriate, we would expect to receive backup materials for those amended reports on the same date as those reports are served.

On incumbent addresses, I believe we will be able to send those in a few hours but I cannot estimate with any more certainty. Unfortunately, such a list is not "readily available," as I understand, for the very reason you anticipated; we are trying to gather in list form all residential addresses as opposed to a list that includes P.O. box numbers and the like. Plaintiffs appear ready to "force the parties to engage in contested briefing" but we can assure you there is no dispute on these addresses. We are just waiting for them to be collected and put into list form for production.

Kate

Katherine L. McKnight
Partner

BakerHostetler
Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Monday, December 13, 2021 12:04 PM

To: McKnight, Katherine L. <kmcknight@bakerlaw.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; 'Imadduri@elias.law' <imadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law' <gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADOerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

As you know, the Legislative Defendants agreed to the exact same protective order covering the exact same source code material in the *Common Cause* litigation, which was also litigation of “overriding public importance.” And when we raised the protective order issue on Thursday during our meet and confer in response to your request for our expert materials at the PI stage, Phil said that a protective order wouldn’t be a problem. It is standard practice to enter into protective orders covering source code, and this protective order allows you and your experts full access to and use of all relevant information for any case-related purpose. If you have any concerns about the content of the protective order, we would be happy to discuss.

We are trying to accommodate your request to receive this source code and other backup material as quickly as possible, even though the materials you’ve requested relate to PI stage reports after the PI has already been granted. Given the extreme time constraints under which we are all working, we cannot understand why you would force the parties to engage in contested briefing about a protective order that you previously agreed to in materially identical litigation. Please let us know if you will reconsider. We are happy to discuss on the phone.

Also, please let us know **what time today** you will be able to send the incumbent addresses, which we asked for on Thursday and which we are indisputably entitled to. We know from the *Common Cause* litigation that this information is readily available to the legislative leaders, and this information was also used to generate the “Statpacks” that are available on the General Assembly’s website. It is critical that we receive this information now for our opening expert reports. If we do not hear from you by 5pm, we will seek relief from the Court, as we did in *Common Cause*.

Best,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>
Sent: Monday, December 13, 2021 8:23 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>
Subject: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Dear Elisabeth,

Thank you for your e-mail below. Regarding the discussion below about a protective order, we believe the data underlying Plaintiffs’ expert reports—including the source code, the data fed into the code, and the output—presents a matter of overriding public importance in the context of this case. We therefore cannot agree to a protective order and submit that it is Plaintiffs’ obligation to disclose the data supporting their expert analysis, and Plaintiffs’ burden to procure a protective order from the Court.

We are all working on an incredibly condensed schedule and propose the following solution:

1. Without waiving their position, Legislative Defendants are amenable to agreeing to the attached version of the protective order (see attached redline proposing edit to substance of the Order) pending resolution of Plaintiffs' motion for protective order so that Plaintiffs may produce today what we requested, namely:
 - a. "copies of the source code, source data, input parameters (i.e., the exact model specifications and input parameters given to the computer programs to perform the simulations analysis), and all data outputted from those simulations (including reporting as well as shapefiles or block-assignment files for the simulated plans) for the analyses that formed the basis for the expert reports of Drs. Chen and Pegden in the Harper case. We also request the data and model parameters underlying Dr. Duchin's expert report in the NCLCV matter. Finally, we request the source code, source data, input parameters (as defined above), and output data (as defined above) used to generate the three "Optimized" Maps/Plans that the NCLCV Plaintiffs asked Dr. Duchin to assess and that they produced to the Court." (Request dated Thursday, Dec. 9.)
2. Plaintiffs agree to file a motion for protective order by Wednesday, December 15, 2021, at 5pm and Legislative Defendants will file their opposition brief by Friday, December 17, 2021, at 5pm. If Plaintiffs fail to file a motion for protective order by that date, Legislative Defendants will understand that Plaintiffs have waived any protective interest in the material and the agreed protective order will no longer bind the parties.
3. If the Court denies Plaintiffs' motion for protective order, then the agreed protective order will no longer bind the parties.
4. If the Court grants Plaintiffs' motion for protective order, then the agreed protective order will continue to bind the parties.

For NCLCV counsel, we do not know where NCLCV Plaintiffs stand in this discussion (and pardon me if I missed an e-mail) but if you believe Dr. Duchin's materials require a protective order we suggest the same framework for resolution.

Finally, we understand your request regarding incumbent addresses and are working to gather residential addresses for incumbents. We hope to update you later today as to status.

We are happy to join a call today if that would aid in resolving this issue.

Thank you all,

Kate

Katherine L. McKnight
Partner

BakerHostetler
Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Friday, December 10, 2021 1:13 PM

To: 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; McKnight, Katherine L. <kmcknight@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; 'lmadduri@elias.law' <lmadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law' <gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

[External Email: Use caution when clicking on links or opening attachments.]

Dear all:

Two updates from the Harper plaintiffs. First, in response to Kate's email yesterday requesting source code, the Harper Plaintiffs are happy to provide source code, inputs, and outputs from Dr. Chen and Dr. Pegden on Monday, on two conditions. First, will Defendants agree to enter into the attached protective order that we all agreed on in Common Cause? We'll update it for this case. Second, will defendants provide, by Monday, a list of the incumbent addresses for both congressional and state legislative districts that the Legislative Defendants used in drawing the maps? Consistent with the experience in the Common Cause case, we will need their home addresses, not P.O. boxes or office addresses. I should note that we do intend to serve updated expert reports, but we are nonetheless happy to send you on Monday the code from the versions we served with the preliminary injunction motion.

Second, on further consideration, we'd like to propose two days for expert video depositions, with a 4 hour cap (including 1 hour for direct) for each expert. We would submit the videos (or excerpts) to the judges.

Given that the deadline is today, please let us know your thoughts on scheduling. We are happy to jump on the phone again.

Best,
Elisabeth

From: Theodore, Elisabeth

Sent: Thursday, December 9, 2021 5:19 PM

To: 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; Feldman, Stephen <SFeldman@robinsonbradshaw.com>

Cc: Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; 'zzz.External.lmadduri@elias.law' <lmadduri@elias.law>; 'zzz.External.jshelly@elias.law' <jshelly@elias.law>; 'zzz.External.gwhite@elias.law' <gwhite@elias.law>; 'zzz.External.akhanna@elias.law' <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam

<ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

All:

Thanks for the discussion earlier today. As promised, our proposal is as follows, in general strokes. As we noted, our proposal is no live evidentiary hearing, and the court would make findings of fact and conclusions of law on the paper submissions. We added a few additional deadlines in addition to what we described on the call, and there may be need to be some other deadlines in there too, like for evidentiary objections. We also pushed back our proposal for a date for submission of proposed findings and conclusions to Jan. 6.

Dec. 15 - deadline to amend pleadings
Dec. 21 - deadline for defendants to answer
Dec. 21 - deadline to exchange evidence (in the form of expert reports, fact witness affidavits)
Dec. 28 - deadline to exchange rebuttal evidence (in the form of rebuttal expert reports)
Dec. 31 - deadline to submit reply expert reports
Jan. 6 - deadline to submit proposed findings of fact and conclusions of law to the Court
Jan. 10 - court could schedule argument if it chooses
Jan. 11 - deadline for court's decision on the merits

As I mentioned, we would agree to mutual foregoing of expert depositions, but reserve the right to take fact witness depositions (which we would propose to do by Zoom). We might want to agree to a deadline to exchange the names of all potential fact witnesses to speed that process along.

From: Alyssa Riggins <alyssa.riggins@nelsonmullins.com>
Sent: Thursday, December 9, 2021 11:41 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Feldman, Stephen <SFeldman@robinsonbradshaw.com>
Cc: Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rRaile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craig <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranche@elias.law' <abranche@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

External E-mail

Hi Elisabeth,

Phil and Kate are available to speak with you at 3:00. Could you please circulate a meeting invitation and be sure to include them?

Best,
Alyssa

From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Sent: Wednesday, December 8, 2021 6:10 PM
To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>
Cc: Phil Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

◀External Email▶ - From: prvs=969f644b3=Elisabeth.Theodore@arnoldporter.com

Counsel:

In light of the court's order, we think it would be best to meet and confer tomorrow on the schedule. Are representatives from all parties available at 1pm or at 3pm?

Best,
Elisabeth

From: Rossi, Alison J. <Alison.J.Rossi@nccourts.org>
Sent: Wednesday, December 8, 2021 5:14 PM
To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>; Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>
Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; zzz.External.Imadduri@elias.law <Imadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

External E-mail

Hello all,

Based on the Supreme Court's order, dated today, December 8, 2021, the court has asked that you provide a proposed scheduling order by Friday, December 10, 2021.

Best,

Alison J. Rossi
Judicial Fellow
North Carolina Judicial Branch
M 919-259-9917
D 919-890-1679
O 919-890-1670

From: Rossi, Alison J.
Sent: Monday, December 6, 2021 1:01 PM
To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>; Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>
Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; john.branch@nelsonmullins.com; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden <MBrad@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abran@elias.law' <abran@elias.law>; 'lmadduri@elias.law' <lmadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law' <gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Jones, Stanton' <Stanton.Jones@arnoldporter.com>; 'sam.callahan@arnoldporter.com' <sam.callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

Hello all,

The court is requesting that the parties in the above captioned case submit a proposed scheduling order by next Tuesday, December 14th, 2021.

While this case and *Harper v. Hall* (21 CVS 500085) have been consolidated, I am sending this message separately to the parties in each case.

Best,

Alison J. Rossi
Judicial Fellow
North Carolina Judicial Branch
M 919-259-9917
D 919-890-1679
O 919-890-1670

From: Feldman, Stephen <SFeldman@robinsonbradshaw.com>
Sent: Friday, December 3, 2021 5:21 PM
To: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>; Rossi, Alison J. <Alison.J.Rossi@nccourts.org>
Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; john.branch@nelsonmullins.com; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden

<MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; 'lmadduri@elias.law' <lmadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law' <gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Jones, Stanton' <Stanton.Jones@arnoldporter.com>; 'sam.callahan@arnoldporter.com' <sam.callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>

Subject: NCLCV v Hall (21 CVS 15426) -- Notice of Appeal

Dear Ms. Myers and Ms. Rossi:

In *NCLCV v Hall*, attached please find a notice of appeal filed this afternoon. I have copied all counsel in the coordinated cases on this email.

Thank you again for your coordination of these matters. All the best.

Stephen D. Feldman

Pronouns: He/Him/His

Robinson Bradshaw

t : 919.239.2603

434 Fayetteville Street, Suite 1600

Raleigh, NC 27601

sfeldman@robinsonbradshaw.com | [Bio
robinsonbradshaw.com](http://Bio.robinsonbradshaw.com)

This email may contain material that is CONFIDENTIAL, PRIVILEGED and/or ATTORNEY WORK PRODUCT for the sole use of the intended recipient. Any review, reliance, distribution or forwarding by others without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

E-mail correspondence to and from this address may be subject to the North Carolina public records laws and if so, may be disclosed.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

Exhibit 8

Alyssa Riggins

From: Schauf, Zachary C. <ZSchauf@jenner.com>
Sent: Tuesday, December 14, 2021 1:25 PM
To: Theodore, Elisabeth; 'McKnight, Katherine L.'; Alyssa Riggins; 'Feldman, Stephen'
Cc: Phil Strach; Tom Farr; John Branch; Braden, E. Mark; Raile, Richard; 'Brennan, Stephanie'; 'Majmundar, Amar'; 'tsteed@ncdoj.gov'; 'Burton Craige'; 'Narendra Ghosh'; 'Paul Smith'; 'melias@elias.law'; 'abranh@elias.law'; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton; Callahan, Sam; 'Doerr, Adam'; 'Zimmerman, Erik'; Hirsch, Sam; Amunson, Jessica Ring; Bracey, Kali N.; Mittal, Urja R.
Subject: Re: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

From the NCLCV Plaintiffs' perspective, we were indeed waiting for the Court's scheduling order to see what it said. The scheduling order provides that expert reports "produced to an opposition party" under the order "shall be accompanied by" appropriate disclosures concerning the analysis the expert conducted. Consistent with the order, we intend to make appropriate disclosures when we produce a report on or before December 23.

Regards,

Zach

Zachary C. Schauf

Jenner & Block LLP
1099 New York Avenue, N.W.
Suite 900, Washington, DC 20001-4412 | jenner.com
+1 202 637 6379 | TEL
+1 202 424 9309 | MOBILE
ZSchauf@jenner.com
[Download V-Card](#) | [View Biography](#)

CONFIDENTIALITY WARNING: This email may contain privileged or confidential information and is for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. If you believe that you have received this email in error, please notify the sender immediately and delete it from your system.

From: "Theodore, Elisabeth" <Elisabeth.Theodore@arnoldporter.com>
Date: Tuesday, December 14, 2021 at 12:21 PM
To: "'McKnight, Katherine L.'" <kmcknight@bakerlaw.com>, 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>, "'Feldman, Stephen'" <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>, 'Tom Farr' <tom.farr@nelsonmullins.com>, 'John Branch' <john.branch@nelsonmullins.com>, "Braden, E. Mark" <MBraden@bakerlaw.com>, "Raile, Richard" <rRaile@bakerlaw.com>, "'Brennan, Stephanie'" <Sbrennan@ncdoj.gov>, "'Majmundar, Amar'" <amajmundar@ncdoj.gov>, "'tsteed@ncdoj.gov'" <tsteed@ncdoj.gov>, 'Burton Craige' <brcraige@pathlaw.com>, 'Narendra Ghosh' <nghosh@pathlaw.com>, 'Paul Smith' <psmith@pathlaw.com>, "'melias@elias.law'" <melias@elias.law>, "'abranh@elias.law'" <abranh@elias.law>, "Imadduri@elias.law" <Imadduri@elias.law>, "jshelly@elias.law" <jshelly@elias.law>, "gwhite@elias.law" <gwhite@elias.law>, "akhanna@elias.law" <akhanna@elias.law>, "Jones, Stanton" <Stanton.Jones@arnoldporter.com>, "Callahan, Sam" <Sam.Callahan@arnoldporter.com>, "'Doerr, Adam'" <ADoerr@robinsonbradshaw.com>, "'Zimmerman,

Erik" <EZimmerman@robinsonbradshaw.com>, "Hirsch, Sam" <SHirsch@jenner.com>, "Amunson, Jessica Ring" <JAmunson@jenner.com>, "Bracey, Kali N." <KBracey@jenner.com>, "Schauf, Zachary C." <ZSchauf@jenner.com>, "Mittal, Urja R." <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

External Email – Exercise Caution
Kate:

Thank you very much for sending the incumbent addresses.

We understood the Court's order from yesterday to require us to produce expert materials with the reports on the 23rd. We will certainly honor our agreement — which was to voluntarily produce PI-related materials earlier *if* you agree to a protective order — but you told us yesterday that you wouldn't agree and would oppose such an order, which is why we didn't produce them yesterday. We have not changed our position, but we do not plan to voluntarily produce source code and other materials relating to PI-stage reports if there is any risk that those materials won't be subject to a protective order.

We intend to move the court, as early as today, for entry of the same protective order to which the parties agreed (and that the panel entered) in Common Cause. We did not understand your addition, which appears to allow parties to unilaterally designate as confidential information that has nothing to do with them and in which they have no protectable interest.

Of course, you retain the right to oppose entry of the order. If you oppose and the Court declines to enter our proposed protective order, we will produce all the expert materials that the Court's scheduling order requires us to produce, but we won't plan to voluntarily produce extra materials such as the PI materials absent a protective order.

Thanks,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>
Sent: Tuesday, December 14, 2021 9:57 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <brcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Thanks for your e-mail, Elisabeth. Last Thursday we asked for Plaintiffs' source code data for Plaintiffs' PI expert reports and were told that Harper Plaintiffs would produce it with a protective order. We asked that it be produced by yesterday and Harper Plaintiffs agreed. Yesterday morning, we agreed to Plaintiffs' protective order with minor revision,

and the requirement that Harper Plaintiffs seek a Court-ordered protective order after production, but Harper Plaintiffs have not yet produced their experts' PI source code. We ask for the courtesy of notice if Harper Plaintiffs have changed their position and no longer intend to produce their experts' PI source code. If we do not hear from you by 2pm today, we will need to seek Court assistance in resolving this dispute.

Zach, for NCLCV Plaintiffs, we understood you were waiting to see the Court's scheduling order to produce. Now that you have the scheduling order and see the Court's requirement for the production of expert source code, will you agree to produce Dr. Duchin's PI source code today? We ask that you confirm NCLCV Plaintiffs' position on producing Dr. Duchin's PI source code by 2pm today. We hope to come to an agreement on this issue but may need to seek Court assistance in resolving this dispute.

As for incumbent addresses, unlike Harper Plaintiffs' agreement to produce information by yesterday, we never promised production by Monday. We received Harper Plaintiffs' written request on Friday afternoon and relayed it that afternoon to Central Staff in the General Assembly. It bears noting that Central Staff are non-partisan staff of the legislative body. Central Staff let us know yesterday morning that your Friday afternoon request would be fulfilled within a few hours and we relayed that information to you noting that this was our belief of timing but that we could not estimate with further certainty. Regardless, attached please find the incumbent address list.

We look forward to your responses.

Kate

Katherine L. McKnight
Partner

BakerHostetler

Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Monday, December 13, 2021 11:59 PM

To: McKnight, Katherine L. <kmcknight@bakerlaw.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bCraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; 'Imadduri@elias.law' <Imadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law' <gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

Thanks for your response. We too hope to avoid motion practice on the issue of the incumbent addresses, but it has now been 10 hours since you advised us that you hoped to send the addresses in "a few hours," and 4 days since we requested these addresses. As you know, these addresses are essential to our expert analysis, and time is short. Please see the attached first set of interrogatories from the Harper plaintiffs to the legislative defendants, which formally request the incumbent addresses by 3pm tomorrow. We will move at that time if we do not hear from you sooner.

I note that we know that this information has already been compiled by the General Assembly based on public documents. The StatPack for the enacted Senate plan (https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2021/SL%202021-173%20Senate%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: NC Senate - 9/20/2021." The StatPack for the enacted House plan (https://www.ncleg.gov/Files/GIS/Plans_Main/House_2021/SL%202021-175%20House%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: NC House - 10/01/2021." And the StatPack for the congressional plan (https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2021/SL%202021-174%20Congress%20-%20StatPack%20Report.pdf) contains an "Incumbent District Report" analysis based on a file entitled "Residence Set: Congress - 9/22/2021."

Thanks,
Elisabeth

Thank you,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>
Sent: Monday, December 13, 2021 1:58 PM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranche@elias.law' <abranche@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Thanks for your e-mails, Elisabeth and Zach.

Legislative Defendants cannot agree to a protective order other than under the arrangement described below. Do Plaintiffs need an additional day or two to file a motion for protective order? We can work with Plaintiffs on that point.

Elisabeth, thank you for working to accommodate our request for backup material today. If the Court allows Plaintiffs to amend their expert reports, which, to be clear, we do not think is appropriate, we would expect to receive backup materials for those amended reports on the same date as those reports are served.

On incumbent addresses, I believe we will be able to send those in a few hours but I cannot estimate with any more certainty. Unfortunately, such a list is not “readily available,” as I understand, for the very reason you anticipated; we are trying to gather in list form all residential addresses as opposed to a list that includes P.O. box numbers and the like. Plaintiffs appear ready to “force the parties to engage in contested briefing” but we can assure you there is no dispute on these addresses. We are just waiting for them to be collected and put into list form for production.

Kate

Katherine L. McKnight
Partner

BakerHostetler

Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Monday, December 13, 2021 12:04 PM

To: McKnight, Katherine L. <kmcknight@bakerlaw.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- source code production

Kate:

As you know, the Legislative Defendants agreed to the exact same protective order covering the exact same source code material in the *Common Cause* litigation, which was also litigation of “overriding public importance.” And when we raised the protective order issue on Thursday during our meet and confer in response to your request for our expert materials at the PI stage, Phil said that a protective order wouldn’t be a problem. It is standard practice to enter into protective orders covering source code, and this protective order allows you and your experts full access to and use of all relevant information for any case-related purpose. If you have any concerns about the content of the protective order, we would be happy to discuss.

We are trying to accommodate your request to receive this source code and other backup material as quickly as possible, even though the materials you've requested relate to PI stage reports after the PI has already been granted. Given the extreme time constraints under which we are all working, we cannot understand why you would force the parties to engage in contested briefing about a protective order that you previously agreed to in materially identical litigation. Please let us know if you will reconsider. We are happy to discuss on the phone.

Also, please let us know **what time today** you will be able to send the incumbent addresses, which we asked for on Thursday and which we are indisputably entitled to. We know from the *Common Cause* litigation that this information is readily available to the legislative leaders, and this information was also used to generate the "Statpacks" that are available on the General Assembly's website. It is critical that we receive this information now for our opening expert reports. If we do not hear from you by 5pm, we will seek relief from the Court, as we did in *Common Cause*.

Best,
Elisabeth

From: McKnight, Katherine L. <kmcknight@bakerlaw.com>
Sent: Monday, December 13, 2021 8:23 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>
Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige' <bcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>
Subject: NCLCV v Hall (21 CVS 15426) -- source code production

External E-mail

Dear Elisabeth,

Thank you for your e-mail below. Regarding the discussion below about a protective order, we believe the data underlying Plaintiffs' expert reports—including the source code, the data fed into the code, and the output—presents a matter of overriding public importance in the context of this case. We therefore cannot agree to a protective order and submit that it is Plaintiffs' obligation to disclose the data supporting their expert analysis, and Plaintiffs' burden to procure a protective order from the Court.

We are all working on an incredibly condensed schedule and propose the following solution:

1. Without waiving their position, Legislative Defendants are amenable to agreeing to the attached version of the protective order (see attached redline proposing edit to substance of the Order) pending resolution of Plaintiffs' motion for protective order so that Plaintiffs may produce today what we requested, namely:
 - a. "copies of the source code, source data, input parameters (i.e., the exact model specifications and input parameters given to the computer programs to perform the simulations analysis), and all data outputted from those simulations (including reporting as well as shapefiles or block-assignment files for the

simulated plans) for the analyses that formed the basis for the expert reports of Drs. Chen and Pegden in the Harper case. We also request the data and model parameters underlying Dr. Duchin's expert report in the NCLCV matter. Finally, we request the source code, source data, input parameters (as defined above), and output data (as defined above) used to generate the three "Optimized" Maps/Plans that the NCLCV Plaintiffs asked Dr. Duchin to assess and that they produced to the Court." (Request dated Thursday, Dec. 9.)

2. Plaintiffs agree to file a motion for protective order by Wednesday, December 15, 2021, at 5pm and Legislative Defendants will file their opposition brief by Friday, December 17, 2021, at 5pm. If Plaintiffs fail to file a motion for protective order by that date, Legislative Defendants will understand that Plaintiffs have waived any protective interest in the material and the agreed protective order will no longer bind the parties.
3. If the Court denies Plaintiffs' motion for protective order, then the agreed protective order will no longer bind the parties.
4. If the Court grants Plaintiffs' motion for protective order, then the agreed protective order will continue to bind the parties.

For NCLCV counsel, we do not know where NCLCV Plaintiffs stand in this discussion (and pardon me if I missed an e-mail) but if you believe Dr. Duchin's materials require a protective order we suggest the same framework for resolution.

Finally, we understand your request regarding incumbent addresses and are working to gather residential addresses for incumbents. We hope to update you later today as to status.

We are happy to join a call today if that would aid in resolving this issue.

Thank you all,

Kate

Katherine L. McKnight
Partner

BakerHostetler

Washington Square
1050 Connecticut Ave, N.W. | Suite 1100
Washington, DC 20036-5403
T +1.202.861.1618

kmcknight@bakerlaw.com
bakerlaw.com



From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Sent: Friday, December 10, 2021 1:13 PM

To: 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; 'Feldman, Stephen' <SFeldman@robinsonbradshaw.com>

Cc: 'Phil Strach' <phil.strach@nelsonmullins.com>; 'Tom Farr' <tom.farr@nelsonmullins.com>; 'John Branch' <john.branch@nelsonmullins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; McKnight, Katherine L. <kmcknight@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; 'Brennan, Stephanie' <Sbrennan@ncdoj.gov>; 'Majmundar, Amar' <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; 'Burton Craige'

<brcraige@pathlaw.com>; 'Narendra Ghosh' <nghosh@pathlaw.com>; 'Paul Smith' <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abbranch@elias.law' <abbranch@elias.law>; Imadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; 'Doerr, Adam' <ADoerr@robinsonbradshaw.com>; 'Zimmerman, Erik' <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; 'Amunson, Jessica Ring' <JAmunson@jenner.com>; 'Kali Bracey' <KBracey@jenner.com>; 'Schauf, Zachary C.' <ZSchauf@jenner.com>; 'Mittal, Urja R.' <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

[External Email: Use caution when clicking on links or opening attachments.]

Dear all:

Two updates from the Harper plaintiffs. First, in response to Kate's email yesterday requesting source code, the Harper Plaintiffs are happy to provide source code, inputs, and outputs from Dr. Chen and Dr. Pegden on Monday, on two conditions. First, will Defendants agree to enter into the attached protective order that we all agreed on in Common Cause? We'll update it for this case. Second, will defendants provide, by Monday, a list of the incumbent addresses for both congressional and state legislative districts that the Legislative Defendants used in drawing the maps? Consistent with the experience in the Common Cause case, we will need their home addresses, not P.O. boxes or office addresses. I should note that we do intend to serve updated expert reports, but we are nonetheless happy to send you on Monday the code from the versions we served with the preliminary injunction motion.

Second, on further consideration, we'd like to propose two days for expert video depositions, with a 4 hour cap (including 1 hour for direct) for each expert. We would submit the videos (or excerpts) to the judges.

Given that the deadline is today, please let us know your thoughts on scheduling. We are happy to jump on the phone again.

Best,
Elisabeth

From: Theodore, Elisabeth

Sent: Thursday, December 9, 2021 5:19 PM

To: 'Alyssa Riggins' <alyssa.riggins@nelsonmullins.com>; Feldman, Stephen <SFeldman@robinsonbradshaw.com>

Cc: Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rRaile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>;

Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <brcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>;

'melias@elias.law' <melias@elias.law>; 'abbranch@elias.law' <abbranch@elias.law>; zzz.External.Imadduri@elias.law <Imadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Jones, Stanton

<Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

All:

Thanks for the discussion earlier today. As promised, our proposal is as follows, in general strokes. As we noted, our proposal is no live evidentiary hearing, and the court would make findings of fact and conclusions of law on the paper submissions. We added a few additional deadlines in addition to what we described on the call, and there may be need to be some other deadlines in there too, like for evidentiary objections. We also pushed back our proposal for a date for submission of proposed findings and conclusions to Jan. 6.

Dec. 15 - deadline to amend pleadings
Dec. 21 - deadline for defendants to answer
Dec. 21 - deadline to exchange evidence (in the form of expert reports, fact witness affidavits)
Dec. 28 - deadline to exchange rebuttal evidence (in the form of rebuttal expert reports)
Dec. 31 - deadline to submit reply expert reports
Jan. 6 - deadline to submit proposed findings of fact and conclusions of law to the Court
Jan. 10 - court could schedule argument if it chooses
Jan. 11 - deadline for court's decision on the merits

As I mentioned, we would agree to mutual foregoing of expert depositions, but reserve the right to take fact witness depositions (which we would propose to do by Zoom). We might want to agree to a deadline to exchange the names of all potential fact witnesses to speed that process along.

From: Alyssa Riggins <alyssa.riggins@nelsonmullins.com>
Sent: Thursday, December 9, 2021 11:41 AM
To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Feldman, Stephen <SFeldman@robinsonbradshaw.com>
Cc: Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rRaile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranche@elias.law' <abranche@elias.law>; zzz.External.lmadduri@elias.law <zzz.External.lmadduri@elias.law>; zzz.External.jshelly@elias.law <zzz.External.jshelly@elias.law>; zzz.External.gwhite@elias.law <zzz.External.gwhite@elias.law>; zzz.External.akhanna@elias.law <zzz.External.akhanna@elias.law>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

External E-mail

Hi Elisabeth,

Phil and Kate are available to speak with you at 3:00. Could you please circulate a meeting invitation and be sure to include them?

Best,
Alyssa

From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Sent: Wednesday, December 8, 2021 6:10 PM
To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>
Cc: Phil Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; John Branch

<john.branch@nelsonmullins.com>; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; lmadduri@elias.law; jshelly@elias.law; gwhite@elias.law; akhanna@elias.law; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

◀**External Email**▶ - From: prvs=969f644b3=Elisabeth.Theodore@arnoldporter.com

Counsel:

In light of the court's order, we think it would be best to meet and confer tomorrow on the schedule. Are representatives from all parties available at 1pm or at 3pm?

Best,
Elisabeth

From: Rossi, Alison J. <Alison.J.Rossi@nccourts.org>
Sent: Wednesday, December 8, 2021 5:14 PM
To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>; Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>
Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>; john.branch@nelsonmullins.com; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden <MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov' <tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith <psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>; zzz.External.lmadduri@elias.law <lmadduri@elias.law>; zzz.External.jshelly@elias.law <jshelly@elias.law>; zzz.External.gwhite@elias.law <gwhite@elias.law>; zzz.External.akhanna@elias.law <akhanna@elias.law>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Callahan, Sam <Sam.Callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring <JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

External E-mail

Hello all,

Based on the Supreme Court's order, dated today, December 8, 2021, the court has asked that you provide a proposed scheduling order by Friday, December 10, 2021.

Best,

Alison J. Rossi
Judicial Fellow
North Carolina Judicial Branch

M 919-259-9917
D 919-890-1679
O 919-890-1670

From: Rossi, Alison J.

Sent: Monday, December 6, 2021 1:01 PM

To: Feldman, Stephen <SFeldman@robinsonbradshaw.com>; Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>

Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>;
john.branch@nelsonmullins.com; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden
<MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>;
Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov'
<tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith
<psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>;
'lmadduri@elias.law' <lmadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law'
<gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Theodore, Elisabeth
<Elisabeth.Theodore@arnoldporter.com>; 'Jones, Stanton' <Stanton.Jones@arnoldporter.com>;
'sam.callahan@arnoldporter.com' <sam.callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>;
Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring
<JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja
R. <UMittal@jenner.com>

Subject: RE: NCLCV v Hall (21 CVS 15426) -- Scheduling order

Hello all,

The court is requesting that the parties in the above captioned case submit a proposed scheduling order by next Tuesday, December 14th, 2021.

While this case and *Harper v. Hall* (21 CVS 500085) have been consolidated, I am sending this message separately to the parties in each case.

Best,

Alison J. Rossi
Judicial Fellow
North Carolina Judicial Branch
M 919-259-9917
D 919-890-1679
O 919-890-1670

From: Feldman, Stephen <SFeldman@robinsonbradshaw.com>

Sent: Friday, December 3, 2021 5:21 PM

To: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>; Rossi, Alison J. <Alison.J.Rossi@nccourts.org>

Cc: Phillip Strach <Phillip.Strach@nelsonmullins.com>; Tom Farr <tom.farr@nelsonmullins.com>;
john.branch@nelsonmullins.com; Alyssa Riggins <Alyssa.Riggins@nelsonmullins.com>; Mark Braden
<MBraden@bakerlaw.com>; Katherine McKnight <kmcknight@bakerlaw.com>; Richard Raile <rraile@bakerlaw.com>;
Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; 'tsteed@ncdoj.gov'
<tsteed@ncdoj.gov>; Burton Craige <bcraige@pathlaw.com>; Narendra Ghosh <nghosh@pathlaw.com>; Paul Smith
<psmith@pathlaw.com>; 'melias@elias.law' <melias@elias.law>; 'abranh@elias.law' <abranh@elias.law>;
'lmadduri@elias.law' <lmadduri@elias.law>; 'jshelly@elias.law' <jshelly@elias.law>; 'gwhite@elias.law'
<gwhite@elias.law>; 'akhanna@elias.law' <akhanna@elias.law>; Theodore, Elisabeth
<Elisabeth.Theodore@arnoldporter.com>; 'Jones, Stanton' <Stanton.Jones@arnoldporter.com>;
'sam.callahan@arnoldporter.com' <sam.callahan@arnoldporter.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>;
Zimmerman, Erik <EZimmerman@robinsonbradshaw.com>; 'Hirsch, Sam' <SHirsch@jenner.com>; Amunson, Jessica Ring

<JAmunson@jenner.com>; Kali Bracey <KBracey@jenner.com>; Schauf, Zachary C. <ZSchauf@jenner.com>; Mittal, Urja R. <UMittal@jenner.com>
Subject: NCLCV v Hall (21 CVS 15426) -- Notice of Appeal

Dear Ms. Myers and Ms. Rossi:

In *NCLCV v Hall*, attached please find a notice of appeal filed this afternoon. I have copied all counsel in the coordinated cases on this email.

Thank you again for your coordination of these matters. All the best.

Stephen D. Feldman

Pronouns: He/Him/His

Robinson Bradshaw

t : 919.239.2603

434 Fayetteville Street, Suite 1600

Raleigh, NC 27601

sfeldman@robinsonbradshaw.com | [Bio](#)
robinsonbradshaw.com

This email may contain material that is CONFIDENTIAL, PRIVILEGED and/or ATTORNEY WORK PRODUCT for the sole use of the intended recipient. Any review, reliance, distribution or forwarding by others without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

E-mail correspondence to and from this address may be subject to the North Carolina public records laws and if so, may be disclosed.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a

complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:

<http://www.arnoldporter.com>

Exhibit 9

STATE OF NORTH CAROLINA
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 014001

FILED

2019 FEB 25 AM 11:07

Wake County, N.C.

COMMON CAUSE, *et al.*
Plaintiffs,

v.

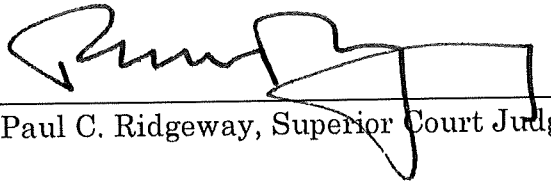
Representative DAVID R. LEWIS,
in his official capacity as Senior
Chairman of the House Select
Committee on Redistricting, *et al.*,
Defendants.

)
)
)
)
)
)
)
)
)
)
)

ORDER

THIS MATTER comes before the undersigned Three-Judge Panel upon the submission by the parties of a Stipulated Proposed Case Management Order filed February 15, 2019. Upon consideration by the Court, it is ORDERED that the schedule and deadlines set out in the Stipulated Proposed Case Management Order be adopted.

This the 22nd day of February, 2019.



Paul C. Ridgeway, Superior Court Judge

/s/ Joseph N. Crosswhite

Joseph N. Crosswhite, Superior Court Judge

/s/ Alma L. Hinton

Alma L. Hinton, Superior Court Judge

STATE OF NORTH CAROLINA
COUNTY OF WAKE

FILED
2019 FEB 15 PM 4:02
WAKE COUNTY, N.C.
LM

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 014001

COMMON CAUSE, et al.,

BY _____

Plaintiffs,

v.

DAVID LEWIS, IN HIS OFFICIAL CAPACITY AS SENIOR
CHAIRMAN OF THE HOUSE SELECT COMMITTEE ON
REDISTRICTING, et al.,

Defendants.

**STIPULATED PROPOSED
CASE MANAGEMENT
ORDER**

(OTHR)

Pursuant to the Court's Order of February 1, 2019, the parties have conferred and agreed upon a case management schedule. The parties have all agreed to forego dispositive pre-trial motions, and accordingly the parties' agreed-upon schedule does not include any deadlines for dispositive motions. The parties have agreed upon the below schedule and deadlines:

Event	Agreed-Upon Dates
Completion of Written Discovery from Current Defendants, Consistent with the N.C. Rules of Civil Procedure	March 20, 2019
Plaintiffs' Expert Reports	March 22, 2019
Completion of Written Discovery from All Other Parties and All Third Parties, Consistent with the N.C. Rules of Civil Procedure	April 17, 2019
Defendants' Expert Reports	April 30, 2019
Completion of Fact Discovery	May 17, 2019
Plaintiffs' Rebuttal Reports	May 31, 2019
Exchange Deposition Designations	June 12, 2019
Expert Witness Deposition Deadline	June 14, 2019
Exchange Deposition Counter-Designations and Objections to Designations	June 19, 2019
Motions in Limine/Motions to Exclude under N.C. Rule 702(a)	June 21, 2019
File Objections to Deposition Counter-Designations	June 26, 2019

Confer Regarding Objections to Deposition Designations	June 28, 2019
Opposition to Motions in Limine/Motions to Exclude under N.C. Rule 702(a)	July 1, 2019
All Parties Exchange Witness and Exhibit Lists	July 1, 2019
Submit to the Court a Conformed Set of Agreed Deposition Designations	July 3, 2019
Submit to the Court for Resolution Unresolved Deposition Designation Objections.	July 3, 2019
Pretrial Stipulations	July 8, 2019
File Objections to Exhibits	July 8, 2019
Trial Briefs	July 8, 2019
Pre-Trial Hearing on Outstanding Motions	July 10, 2019
Deliver to the Court Hard Copy Pre-Marked, Indexed Exhibits	July 12, 2019
Trial Begins	July 15, 2019
Post-Trial Briefs	10 days after conclusion of trial

* * *

WHEREFORE, the parties request that the Court enter an order adopting the case management schedule set forth above.

Respectfully submitted this the 15th day of February, 2019.

POYNER SPRUILL LLP

By: Edwin M. Speas, Jr.
Edwin M. Speas, Jr. *with permission*
N.C. State Bar No. 4112 *by EMM*
Caroline P. Mackie *Bar No. 53227*
N.C. State Bar No. 41512
P.O. Box 1801
Raleigh, NC 27602-1801
(919) 783-6400
espeas@poynerspruill.com

*Counsel for Common Cause, the
North Carolina Democratic Party,
and the Individual Plaintiffs*

**ARNOLD & PORTER
KAYE SCHOLER LLP**

R. Stanton Jones*
David P. Gersch*
Elisabeth S. Theodoro*
Daniel F. Jacobson*
601 Massachusetts Ave. NW
Washington, DC 20001-3743
(202) 942-5000
stanton.jones@arnoldporter.com

PERKINS COIE LLP

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

Abha Khanna*
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000
akhanna@perkinscoie.com

*Counsel for Common Cause and the
Individual Plaintiffs*

**Pro hac vice motions pending*

BAKER & HOSTETLER, LLP

E. Mark Braden* (DC Bar No. 419915)
Richard B. Raile* (Va. Bar No. 84340)
Trevor M. Stanley* (Va. Bar No. 77351)
1050 Connecticut Ave Suite 1100
Washington, DC, 20036
rraile@bakerlaw.com
mbraden@bakerlaw.com
tstanley@bakerlaw.com
Telephone: (202) 861-1500
Facsimile: (202) 861-1783

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

Phillip J. Strach (N.C. Bar # No. 29456)
Michael D. McKnight (N.C. Bar # No. 36932)
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
phil.strach@ogletreedeakins.com
michael.mcknight@ogletreedeakins.com
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for Legislative Defendants

**Pro hac vice motions pending*

Amar Majmundar (N.C. Bar No. 24668)
Senior Deputy Attorney General
Stephanie A. Brennan (N.C. Bar No. 35955)
Special Deputy Attorney General
North Carolina Dept. of Justice
P.O. Box 629
Raleigh, NC 27602
Email: sbrennan@ncdoj.gov
Tele No.: (919) 716-6920
Fax No.: (919) 716-6763

Counsel for State Defendants

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *by email*, addressed to the following persons at the following addresses which are the last addresses known to me:

Amar Majmundar
Stephanie A. Brennan
NC Department of Justice
P.O. Box 629
114 W. Edenton St.
Raleigh, NC 27602
amajmundar@ncdoj.gov
sbrennan@ncdoj.gov
*Counsel for the State of North Carolina and State Board of
Elections and Ethics Enforcement and its members*

Phillip J. Strach
Michael McKnight
Alyssa Riggins
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
4208 Six Forks Road, Suite 1100
Raleigh, NC 27609
Phillip.strach@ogletree.com
Michael.mcknight@ogletree.com
Alyssa.riggins@ogletree.com

E. Mark Braden
Richard B. Raile
Trevor M. Stanley
Baker & Hostetler, LLP
Washington Square, Suite 1100
1050 Connecticut Ave., N.W.
Washington, DC 20036-5403
rraile@bakerlaw.com
mbraden@bakerlaw.com
tstanley@bakerlaw.com
Counsel for the Legislative Defendants

This the 15th day of February, 2019.

Caroline P. Mackie with permission
Caroline P. Mackie by EMM
NC State Bar No.
53227

Exhibit 10

STATE OF NORTH CAROLINA
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
18 CVS 014001

FILED

COMMON CAUSE, *et al*, 2019 MAR 21 P) 14
Plaintiffs,)

v.)

WAKE COUNTY,)


AMENDED
CASE MANAGEMENT ORDER

Representative DAVID R. LEWIS,)
in his official capacity as Senior)
Chairman of the House Select)
Committee on Redistricting, et al.,)
Defendants.)

THIS MATTER comes before the undersigned Three-Judge Panel upon Legislative Defendants' Motion for a Protective Order, Plaintiffs' First Motion to Compel, and Plaintiffs' Second Motion to Compel. For the purposes of efficient management of this matter, the Court orders the following:

1. The Case Management Order entered in this case on February 15, 2019, is amended by this Order.
2. Due to the discovery motions filed by the Parties, the Three-Judge Panel will extend the deadline for Plaintiffs to submit their expert reports to April 1, 2019.
3. The terms of the February 15, 2019, Order remain otherwise in full effect.

So ordered, this the 21st day of March, 2019.



Paul C. Ridgeway, Superior Court Judge

/s/ Joseph N. Crosswhite

Joseph N. Crosswhite, Superior Court Judge

/s/ Alma L. Hinton

Alma L. Hinton, Superior Court Judge

Certificate of Service

The undersigned certifies that the foregoing was served upon all parties by electronic mail, addressed as follows:

Edwin M. Speas, Jr.
Caroline P. Mackie
Poynner Spruill LLP
espeas@poynnerspruill.com
cmackie@poynnerspruill.com
*Counsel for Common Cause,
The North Carolina Democratic Party
And the Individual Plaintiffs*

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
Arnold & Porter Kaye Scholer, LLP
Stanton.jones@arnoldporter.com
David.gersch@arnoldporter.com
Elisabeth.theodore@arnoldporter.com
Daniel.jacobson@arnoldporter.com
*Counsel for Common Cause
And for Individual Plaintiffs*

Mark E. Braden
Richard Raile
Trevor Stanley
Baker & Hostetler, LLP
rraile@bakerlaw.com
mbraden@bakerlaw.com
tstanley@bakerlaw.com
Attorneys for Legislative Defendants

Marc E. Elias
Aria C. Branch
Perkins Coie, LLP
melias@perkinscoie.com
ABranch@perkinscoie.com
*Counsel for Common Cause
And the Individual Plaintiffs*

Abha Khanna
Perkins Coie, LLP
akhanna@perkinscoie.com
*Counsel for Common Cause
And the individual Plaintiffs*

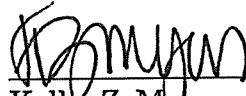
Phillip J. Strach
Michael McKnight
Alyssa Riggins
Ogletree, Deakins et al.
Phillip.strach@ogletree.com
Michael.mcknight@ogletree.com
Alyssa.riggins@ogletree.com
Counsel for Legislative Defendants

Stephanie A. Brennan
Amar Majmundar
Paul Cox
NC Department of Justice
sbrennan@ncdoj.gov
amajmundar@ncdoj.gov
pcox@ncdoj.gov
*Counsel for the State of North
Carolina and members of the State
Board of Elections*

Josh Lawson
NC State Board of Elections
joshua.lawson@ncsbe.gov
*Counsel for the State Board of
Elections*

John E. Branch, III
H. Denton Worrell
Nathaniel J. Pencook
Shanahan McDougal, PLLC
jbranch@shanahanmcdougal.com
dworrellshanahanmcdougal.com
npencook@shanahanmcdougal.com
Attorneys for Defendant-Intervenors

This the 21st day of March, 2019.



Kellie Z. Myers
Trial Court Administrator
10th Judicial District
Kellie.Z.Myers@nccourts.org