

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24CV003534-910

BEVERLY BARD, et al.,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS, et al.,

Defendants.

**STATE DEFENDANTS’
ANSWER**

Defendants, the North Carolina State Board of Elections; its members in their official capacity, Alan Hirsch, Jeff Carmon, Stacy Eggers, IV, Kevin N. Lewis, Siobhan O’Duffy Millen; its Executive Director, Karen Brinson Bell; and the State of North Carolina (collectively, the “State Defendants”), hereby answer Plaintiffs’ Complaint as follows:

INTRODUCTION

Plaintiffs’ Introduction provides a summary of the allegations in their Complaint and, therefore, no response is required. To the extent a response is necessary, State Board Defendants respond to the Introduction by incorporating their individual responses below.

JURISDICTION AND VENUE

1. Admitted.
2. Admitted.
3. Admitted.

PARTIES

4. Admitted to the extent this paragraph alleges that Beverly Bard is a citizen and resident of Guilford County, North Carolina; that her residence was within Congressional District 6 under the districting plan used in the 2022 elections and is currently within the same district under the plan being used in the 2024 elections; that she is registered as affiliated with the Democratic Party; and that she voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

5. Admitted to the extent the paragraph alleges that Richard Levy is a citizen and resident of Guilford County, North Carolina; that his residence was within Congressional District 6 in the districting plan used in the 2022 elections and is currently within Congressional District 5 under the plan being used in the 2024 elections; that he is registered as unaffiliated; and that he voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

6. Admitted to the extent the paragraph alleges that Susan King Cope is a citizen and resident of Wake County, North Carolina; that her residence was within Congressional District 13 in the districting plan used in the 2022 elections and is currently within Congressional District 4 under the plan being used in the 2024 elections; that she is registered as a Democrat; and that she voted in the 2022 primary and general elections.

Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

7. Admitted to the extent this paragraph alleges that Allen H. Wellons is a citizen and resident of Johnson County, North Carolina; that his residence was within Congressional District 13 in the districting plan used in the 2022 elections and is currently within the same district under the plan being used in the 2024 elections; that he is affiliated with the Democratic Party; and that he voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

8. Admitted to the extent this paragraph alleges that Linda Minor is a citizen and resident of Mecklenburg County, North Carolina; that that her residence was within Congressional District 14 in the districting plan used in the 2022 elections and is currently within Congressional District 12 under the plan being used in the 2024 elections; that she is affiliated with the Democratic Party; and that she voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

9. Admitted to the extent this paragraph alleges that Thomas W. Ross is a citizen and resident of Mecklenburg County, North Carolina; that his residence was within Congressional District 12 in the districting plan used in the 2022 elections and is currently within Congressional District 14 under the plan being used in the 2024 elections; that he is registered as affiliated with the Democratic Party; and that he voted in the 2022 primary

and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

10. Admitted to the extent this paragraph alleges that Marie L. Gordon is a citizen and resident of New Hanover County, North Carolina; that her residence was within State Senate District 7 in the districting plan used in the 2022 elections and is currently within State Senate District 8 under the plan being used in the 2024 elections; that she is registered as affiliated with the Democratic Party; and that she voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

11. Admitted to the extent this paragraph alleges that Sarah Katherine Schultz is a citizen and resident of New Hanover County, North Carolina; that her residence was within State Senate District 7 in the districting plan used in the 2022 elections and is currently within the same district under the plan being used in the 2024 elections; that she is registered as affiliated with the Democratic Party; and that she voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

12. Admitted to the extent this paragraph alleges that Joseph J. Coccia is a citizen and resident of Mecklenburg County, North Carolina; that his residence was within State House District 105 in the districting plan used in the 2022 elections and is currently within the same district under the plan being used in the 2024 elections; that he is registered as affiliated with the Democratic Party; and that he voted in the 2022 primary and general

elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

13. Admitted to the extent this paragraph alleges that Timothy S. Emry is a citizen and resident of Mecklenburg County, North Carolina; that his residence was within State House District 105 in the districting plan used in the 2022 elections and is currently within State House District 103 under the plan being used in the 2024 elections; that he is registered as affiliated with the Democratic Party; and that he voted in the 2022 primary and general elections. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

14. Admitted to the extent this paragraph alleges that James G. Rowe is a citizen and resident of Buncombe County, North Carolina; that his residence is currently within Congressional District 11 under the plan being used in the 2024 elections; and that he is registered as unaffiliated with the Democratic Party. Denied to the extent that the paragraph alleges Mr. Rowe has been registered to vote in North Carolina since 1972. Review of information available through the State Election Information Management System (“SEIMS”) indicates that Mr. Rowe has been registered to vote in North Carolina since 1968. Otherwise, State Defendants lack sufficient information to admit or deny the allegations in this paragraph.

15. Admitted.

16. Admitted.

17. Admitted.

18. Admitted.
19. Admitted.
20. Admitted.
21. Admitted upon information and belief.
22. Admitted upon information and belief.

FACTUAL ALLEGATIONS

23. Neither admitted nor denied to the extent that the materials referenced are matters of public record, speak for themselves, and are the best evidence of their content.

24. Neither admitted nor denied to the extent that the materials and matters referenced and cited are matters of public record, speak for themselves, and are the best evidence of their content. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

25. State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

26. State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or

conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

27. State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

28. State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

29. Neither admitted nor denied to the extent that the materials and matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

30. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

31. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

32. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

33. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

North Carolina Congressional District 6

34. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content.

35. To the extent that this paragraph states a legal conclusion, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

36. Admitted.

37. Admitted this accurately states the vote totals in Guilford County.

38. Admitted.

39. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions.

40. It is admitted that the North Carolina General Assembly enacted legislation in October 2023 which established new state senate, state house, and congressional districts.

41. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

42. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

43. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or

conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

44. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

45. Admitted to the extent the paragraph alleges that Kathy Manning did not notice her candidacy for the 2024 Democratic Party primary election for Congressional District 6; that no individuals noticed candidacies for the 2024 Democratic Party, Libertarian Party, or Green Party primary election for Congressional District 6; and that there were six individuals who noticed candidacies for the 2024 Republican Party primary for Congressional District 6. To the extent that this paragraph otherwise contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

46. To the extent that this paragraph states argument, conclusory allegations, or legal conclusions, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

North Carolina Congressional District 13

47. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content.

48. To the extent that this paragraph states a legal conclusion, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

49. Admitted.

50. Admitted.

51. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions.

52. It is admitted that the North Carolina General Assembly enacted legislation in October 2023 which established new state senate, state house, and congressional districts.

53. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or

conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

54. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

55. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

56. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or

conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

57. Admitted to the extent the paragraph alleges that Wiley Nickel did not notice his candidacy for the 2024 Democratic Party primary election for Congressional District 13; that Jeremiah Frank Lee Pierce noticed his candidacy for the 2024 Democratic Party primary for Congressional District 13; that no individuals noticed candidacies for the 2024 Libertarian Party or Green Party primary election for Congressional District 13; and that fourteen individuals did notice their candidacies for the 2024 Republican Party primary election for Congressional District 13. To the extent that this paragraph otherwise contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

58. To the extent that this paragraph states argument, conclusory allegations, or legal conclusions, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

North Carolina Congressional District 14

59. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content.

60. To the extent that this paragraph states a legal conclusion, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

61. Admitted.

62. Admitted.

63. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions.

64. It is admitted that the North Carolina General Assembly enacted legislation in October 2023 which established new state senate, state house, and congressional districts.

65. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

66. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not

directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

67. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

68. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

69. Admitted to the extent the paragraph alleges that Jeff Jackson did not notice his candidacy for the 2024 Democratic Party primary for Congressional District 14; that Pam Genant and B.K. Maginnis noticed their candidacies for the 2024 Democratic Party

primary for Congressional District 14; that no individuals noticed candidacies for the 2024 Libertarian Party or Green Party primary election for Congressional District 14; and that there were three individuals who noticed candidacies for the 2024 Republican Party primary for Congressional District 14, including Timothy K. Moore, who is, upon information and belief, the same Timothy K. Moore currently serving as Speaker of the North Carolina House. To the extent that this paragraph otherwise contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

70. To the extent that this paragraph states argument, conclusory allegations, or legal conclusions, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

State Senate District 7

71. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content.

72. To the extent that this paragraph states a legal conclusion, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

73. Admitted.

74. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions.

75. It is admitted that the North Carolina General Assembly enacted legislation in October 2023 which established new state senate, state house, and congressional districts.

76. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

77. Admitted to the extent the paragraph alleges that David L. Hill noticed his candidacy for the 2024 Democratic Party primary for State Senate District 7; that John Evans noticed his candidacy for the 2024 Libertarian Party primary for State Senate District 6; and that Mike Lee, who is upon information and believe the incumbent state senator for State District 7, noticed his candidacy for the 2024 Republican Party primary for State Senate District 7.

78. To the extent that this paragraph states argument, conclusory allegations, or legal conclusions, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

State House District 105

79. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content.

80. To the extent that this paragraph states a legal conclusion, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

81. Admitted

82. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions.

83. It is admitted that the North Carolina General Assembly enacted legislation in October 2023 which established new state senate, state house, and congressional districts.

84. Neither admitted nor denied to the extent that the matters referenced are matters of public record, speak for themselves, and are the best evidence of their content. Otherwise, State Board Defendants neither admit nor deny this allegation as it is not directed at State Board Defendants. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State

Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

85. Admitted to the extent the paragraph alleges that three individuals, Yolando Holmes, Terry Lansdell, and Nicole Sidman, noticed their candidacies for the 2024 Democratic Party primary for State House District 105; and that one individual, Tricia Cotham, noticed her candidacy for the 2024 2024 Republican Party primary for State House District 105. It is further admitted, upon information and belief, that Ms. Cotham is currently the representative for State House District 112.

86. To the extent that this paragraph states argument, conclusory allegations, or legal conclusions, no response is necessary. Otherwise, State Defendants are without sufficient information to admit or deny the allegation.

87. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

88. Neither admitted nor denied to the extent that the materials referenced are matters of public record, speak for themselves, and are the best evidence of their content.

89. Neither admitted nor denied to the extent that the materials referenced are matters of public record, speak for themselves, and are the best evidence of their content.

90. Neither admitted nor denied to the extent that the materials referenced are matters of public record, speak for themselves, and are the best evidence of their content.

91. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

CLAIM FOR RELIEF

N.C. Const, art. I, § 36 Violation of the Right to Fair Elections

92. State Board Defendants incorporate their previous responses.

93. Neither admitted nor denied to the extent that Article I, Section 36 of the North Carolina Constitution speaks for itself and is the best evidence of its content.

94. Neither admitted nor denied to the extent that the case cited is a matter of public record, speaks for itself, is the best evidence of its content, and contains legal conclusions. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

95. Neither admitted nor denied to the extent that the allegation references the content of legal authority that is a matter of public record, speaks for itself, and is the best evidence of its content. To the extent that this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

96. Because this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

97. Because this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

98. Because this paragraph contains argument or conclusory allegations, no response is required. To the extent a response is required, State Board Defendants lack sufficient information to admit or deny the argument, conclusory allegations, or any remaining allegations.

ANY AND ALL OTHER ALLEGATIONS MADE IN PLAINTIFFS' COMPLAINT, INCLUDING THE RELIEF REQUESTED, EXCEPT AS SPECIFICALLY ADMITTED ABOVE, ARE HEREBY DENIED.

FURTHER ANSWERING THE COMPLAINT AND AS FURTHER DEFENSES THERETO, DEFENDANTS ASSERT THE FOLLOWING:

State Board Defendants reserve the right to assert defenses against Plaintiff that may become apparent during the course of litigation and discovery.

Respectfully submitted, this the 12th day of March, 2024.

NORTH CAROLINA
DEPARTMENT OF JUSTICE

/s/ Terence Steed

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Counsel for State Board Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel for the Plaintiffs and the other Defendants by and through the use of the Court's electronic filing system electronically mailing the same in PDF format using the following addresses:

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Counsel for Legislative Defendants
** Motion for pro hac vice forthcoming*

This the 12th day of March, 2024.

NORTH CAROLINA
DEPARTMENT OF JUSTICE

/s/ Mary Carla Babb
Mary Carla Babb
Special Deputy Attorney General