

STATE OF NORTH CAROLINA

COUNTY OF WAKE

COMMON CAUSE, et al.,

Plaintiffs,

v.

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

Defendants.

**FILED**

2019 JUL -8 P 3:17

WAKE CO., C.C.S.

BY \_\_\_\_\_



IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

18 CVS 014001

**PLAINTIFFS' OBJECTIONS  
TO DEFENDANTS'  
TRIAL EXHIBITS**

Common Cause, et al., v. Lewis, et al., Wake County Superior Court 18 CVS 014001  
 Plaintiffs' Objections to Legislative Defendants Trial Exhibit List

Exhibit Number	Exhibit Description	Bates Number	Deposition Exhibit Number	Document Date	Plaintiffs' Objections
LDTX001	2018 House Election Districts Map			2/14/2018	
LDTX002	2018 Senate Election Districts Map			2/14/2018	
LDTX003	2018 Senate Election Districts Map reports			2/15/2018	
LDTX004	2018 House Election Districts Map reports			2/15/2018	
LDTX005	2017 House Redistricting Plan A2 (HB 927 3rd Ed. Combined (4))			8/28/2017	
LDTX006	2017 Senate Floor Redistricting Plan - 4th Ed (S691 4th Ed. Combined (1))			8/28/2017	
LDTX007	2017 House and Senate Plans Criteria				
LDTX008	Transcript of the Proceedings of North Carolina General Assembly Senate Committee on Redistricting	LDNCO 01237 to LDNCO 01368		8/24/2017	Hearsay; Sword/Shield
LDTX009	2017 Legislative Session, Senate Floor Senate Bill 691 Second Reading	LDNCO 01369 to LDNCO 01525		8/25/2017	Hearsay; Sword/Shield
LDTX010	Transcript of the Proceedings of North Carolina General Assembly North Carolina Senate Session	LDNCO 01526 to LDNCO 01600		8/28/2017	Hearsay; Sword/Shield
LDTX011	Transcript of the Proceedings of North Carolina General Assembly Senate Committee on Redistricting	LDNCO 01601 to LDNCO 01805		8/29/2017	Hearsay; Sword/Shield
LDTX012	2017 Session, Senate, North Carolina General Assembly, House Bill 927 Second Reading	LDNCO 01806 to LDNCO 01824		8/30/2017	Hearsay; Sword/Shield
LDTX013	Transcript of the Proceedings of the North Carolina General Assembly House Committee on Redistricting	LDNCO 00713 to LDNCO 00841		8/25/2017	Hearsay; Sword/Shield
LDTX014	Transcript of the Proceedings of the North Carolina General Assembly House of Representatives Session	LDNCO 00842 to LDNCO 00926		8/28/2017	Hearsay; Sword/Shield
LDTX015	Transcript of the Proceedings of the North Carolina General Assembly House Committee on Redistricting	LDNCO 00927 to LDNCO 00931		8/29/2017	Hearsay; Sword/Shield
LDTX016	Transcript of the Proceedings of the North Carolina General Assembly House of Representatives Session	LDNCO 00932 to LDNCO 00978		8/30/2017	Hearsay; Sword/Shield
LDTX017	SB691, Ed.3 - 2017 Senate Floor Redistricting Plan-2nd Read - McKissick Request (available at <a href="https://www.ncleg.gov/Sessions/2017/s691maps/SB691%20Ed%203%20McKissick%20Request.pdf">https://www.ncleg.gov/Sessions/2017/s691maps/SB691%20Ed%203%20McKissick%20Request.pdf</a> )			8/25/2017	
LDTX018	Request for Information from Senior Chairman Lewis (available at <a href="https://www.ncleg.gov/documents/sites/committees/house/2017-183/Request%20for%20Information%20from%20Senior%20Chairman%20Lewis.pdf">https://www.ncleg.gov/documents/sites/committees/house/2017-183/Request%20for%20Information%20from%20Senior%20Chairman%20Lewis.pdf</a> )			8/29/2017	Hearsay; Sword/Shield
LDTX019	HB 927, Ed. 3 - 2017 House Redistricting Plan A2 - 2016 statistical package (available at <a href="https://www.ncleg.gov/Sessions/2017/h927maps/H927%20Plan%20A2%20HBK-25%20-%20dc2016GE_StatPack.pdf">https://www.ncleg.gov/Sessions/2017/h927maps/H927%20Plan%20A2%20HBK-25%20-%20dc2016GE_StatPack.pdf</a> )			8/29/2017	
LDTX020	Affidavit of Allan J. Lichtman, Ph.D. in <i>Dickson v. Rucho</i> (available at <a href="https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20First%20Affidavit_Dickson.pdf">https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20First%20Affidavit_Dickson.pdf</a> )			1/18/2012	Relevance; Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX021	Second Affidavit of Allan J. Lichtman in <i>Dickson v. Rucho</i> ( <a href="https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20Second%20Affidavit_Dickson.pdf">https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20Second%20Affidavit_Dickson.pdf</a> )				Relevance; Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX022	Sur-rebuttal report of Dr. Allan J. Lichtman to Reports Submitted by Expert for Defendants in <i>Covington v. North Carolina</i> (available at <a href="https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20Report_Covington.pdf">https://www.ncleg.gov/Sessions/2017/s691maps/Lichtman%20Report_Covington.pdf</a> )			1/29/2016	Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX023	Affidavit of Dan Frey and exhibits			6/19/2019	Failure to disclose identity of witness in interrogatories; Undisclosed expert opinions and work product; Hearsay; sword/shield; failure to turn over documents in discovery
LDTX024	Affidavit of R. Erika Churchill and exhibits			6/19/2019	Failure to disclose identity of witness in interrogatories; Undisclosed expert opinions and work product; Hearsay; sword/shield; failure to turn over documents in discovery

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LDTX025	Affidavit of Raleigh Myers and exhibits			6/19/2019	Failure to disclose identity of witness in interrogatories; Undisclosed expert opinions and work product; Hearsay; sword/shield; failure to turn over documents in discovery
LDTX026	Common Cause Senate Simulation with Group Overlay and reports			7/25/2017	Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX027	Common Cause House Simulation with Group Overlay and reports			7/25/2017	Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX028	Covington Senate 2017 Remedy Map, titled STV-1-Blue-Fair, Legal and Competitive Senate Districts, and reports			8/23/2017	Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX029	Covington Plaintiffs Proposed House Plan and reports			8/24/2017	Hearsay, Authenticity, Foundation; Undisclosed expert opinions and work product;
LDTX030	Notice of Filing in <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184			9/7/2017	
LDTX031	Covington House 2017 Map (Rep. Jackson Proposed Map and Reports Considered by House Select Committee on Redistricting), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-28			8/23/2017	
LDTX032	H927-ABK-42-Districts 82 and 83 (Rep. Speclate Proposed Map and Reports Considered by House Select Committee on Redistricting), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-38				
LDTX033	H927-ABK-41-Districts 1 and 6 (Rep. Hunter Proposed Map and Reports Considered by House Select Committee on Redistricting), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-39				
LDTX034	H927-ABK-43-Districts 82 and 83 (Amendment 1: Representative Pittman Proposed Map and Reports), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-26				
LDTX035	H927-ABK-44-Wake County (Amendment 2: Representative Lewis Proposed Map and Reports), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-27				
LDTX036	S691-AMT-34-Districts 19 and 21 (Sen. Clark Proposed Map and Reports Considered by Senate Redistricting Committee), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-29				
LDTX037	S691-AMT-30-Districts 14 and 15 (Sen. Blue Proposed Map and Reports Considered by Senate Redistricting Committee), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-30				
LDTX038	S691-ATC-122 - Blue - Districts 14 and 15 (Amendment 2: Sen. Blue Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-31				
LDTX039	S691-ATV-33-Guilford Floor Amendment (Amendment 3: Sen. Robinson Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-32				
LDTX040	S691-ATV-32- Mecklenburg Floor Amendment (Amendment 4: Sen. Jeff Jackson Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-33				
LDTX041	STV-1-Blue-Fair, Legal and Competitive Senate Districts (Amendment 5: Sen. Blue Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-34				
LDTX042	SRN-2 (Amendment 8: Sen. Robinson Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-35				
LDTX043	STC-1-Cumberland Amendment 3rd Reading (Amendment 9: Sen. Clark Proposed Map and Reports Considered on Senate Floor), <i>Covington v. North Carolina</i> , Case No. 1:15-cv-00399 (M.D.N.C.), ECF No. 184-36				
LDTX044	11/04/2008 Official General Election Results-Statewide for the North Carolina House of Representatives				
LDTX045	11/04/2008 Official General Election Results-Statewide for the North Carolina Senate				
LDTX046	11/02/2010 Official General Election Results-Statewide for the North Carolina House of Representatives				
LDTX047	11/02/2010 Official General Election Results-Statewide for the North Carolina Senate				
LDTX048	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives				
LDTX049	11/06/2018 Official General Election Results-Statewide for the North Carolina Senate				
LDTX050	07/18/2017 Email from NCDP Press to Julie Buckner, subject "ICYMI Politico: Can Roy Cooper Show Democrats How to Win Again?"	NCDP-0014428 to NCDP-0014432	Jackson Exhibit 2	7/18/2017	Hearsay; Foundation
LDTX051	House Redistricting Plan - 2003 map		Jackson Exhibit 3		Hearsay; Relevance; Foundation
LDTX052	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives		Jackson Exhibit 5		
LDTX053	11/06/2018 Official General Election Results-Statewide for the North Carolina Senate		Jackson Exhibit 6		

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Exhibit Number	Exhibit Description	Pages Number	Deposition Exhibit Number	Document Date	Plaintiffs' Objections
LDTX054	07/18/2017 Email from Ryan Deeter, subject "Break the Majority Launch and Press Kit" (designated confidential)	NCDP-0014433 to NCDP-0014440	Jackson Exhibit 8	7/18/2017	
LDTX055	04/26/2018 Email from Robert Howard to Letitia.Stein@thomsonreuters.com, subject "RE: Reuters Inquiry" (designated confidential)	NCDP-003208 to NCDP-0032313	Jackson Exhibit 9	4/26/2018	hearsay; foundation
LDTX056	S691-ATC-122 - Blue - Districts 14 and 15 Map and reports		Crayton Exhibit 1	8/24/2017	hearsay; foundation
LDTX057	SRN-2 Map and reports		Crayton Exhibit 4	8/28/2017	hearsay; foundation
LDTX058	S691-ATV-33-Guilford Floor Amendment Map and reports		Crayton Exhibit 5	8/24/2017	hearsay; foundation
LDTX059	STV-1-Blue-Fair, Legal and Competitive Senate Districts Map and reports		Blue Exhibit 1	8/24/2017	foundation; hearsay
LDTX060	S691-ATV-32-Mecklenburg Floor Amendment Map and reports		Blue Exhibit 3; Crayton Exhibit 2	8/24/2017	foundation; hearsay
LDTX061	Subpoena to Stephanie Hofeller Lizon, 02/13/2019		Hofeller Exhibit 1	2/13/2019	
LDTX062	Subpoena to Kathleen H. Hofeller, 01/15/2019		Hofeller Exhibit 3	1/15/2019	
LDTX063	Subpoena to The Estate of Thomas Hofeller, 02/01/2019		Hofeller Exhibit 4	2/1/2019	
LDTX064	Certificate of Service (Incompetent Proceeding), 11/02/2018		Hofeller Exhibit 5	11/2/2018	foundation; hearsay; relevance; unfairly prejudicial
LDTX065	Petition for Adjudication of Incompetence and Application for Appointment of Guardian or Limited Guardian for Respondent Kathleen Hartsough Hofeller, 10/29/2018		Hofeller Exhibit 6	10/29/2018	hearsay; relevance; unfairly prejudicial
LDTX066	Interim Report of the Guardian Ad Litem for Respondent Kathleen Hartsough Hofeller, 11/5/2018		Hofeller Exhibit 7	11/5/2018	foundation; hearsay; relevance
LDTX067	Order on Motion for Appointment of Interim Guardian, 11/6/2018		Hofeller Exhibit 8	11/6/2018	foundation; relevance
LDTX068	Report of the Guardian Ad Litem in the Matter of Kathleen Hartsough Hofeller, 02/6/2019		Hofeller Exhibit 9	2/6/2019	relevance; hearsay
LDTX069	Motion to Dismiss, 02/07/2019		Hofeller Exhibit 10	2/7/2019	
LDTX070	Covington House 2017 Map and reports		Glikeson Exhibit 1	8/23/2017	
LDTX071	Covington Senate 2017 Remedy Map and reports		Glikeson Exhibit 2	8/23/2017	
LDTX072	Johnson Figure 1. 2017 Adopted Senate Map				
LDTX073	Johnson Figure 2. Maximum Republican Senate Test Map				
LDTX074	Johnson Figure 3. 2017 Adopted Senate Districts in Mecklenburg County				
LDTX075	Johnson Figure 4. Maximum Republican Test Districts in Mecklenburg County				
LDTX076	Johnson Figure 5. 2001 Adopted Senate Map				
LDTX077	Johnson Figure 6. 2017 Adopted Senate Mecklenburg Map				
LDTX078	Johnson Figure 7. Pro-Republican Alternative				
LDTX079	Johnson Figure 8. 2017 Adopted House Districts in Wake County				
LDTX080	Johnson Figure 9. 2017 Pro-Republican House Districts in Wake County				
LDTX081	Johnson Figure 10. Adopted 2017 Senate Districts 8 and 9				
LDTX082	Johnson Figure 11. Pro-Republican New Hanover Shift in Senate Districts 8 and 9				
LDTX083	Johnson Table 1. Mecklenburg County Compactness Scores				
LDTX084	Johnson Table 2. Wake County Compactness Scores				
LDTX085	Johnson Supplemental Figure 1. Districts 37, 38, 39, 40, and 41				
LDTX086	Johnson Supplemental Figure 2. Districts 37, 38, 39, 40, and 41				
LDTX087	Johnson Supplemental Figure 1. Republican Advantage, Map of Charlotte				
LDTX088	Johnson Supplemental Table 1. Republican Advantage in Mecklenburg County				
LDTX089	Johnson Rebuttal Map 1				
LDTX090	Johnson Rebuttal Map 2				
LDTX091	Thomton Figure 1. Average Democratic Vote Share Among Statewide Elections Included by Each Expert Preparing Simulations				hearsay, relevance, unfairly prejudicial
LDTX092	Thomton Figure 2. Comparison of the Enacted Map and the Average Across Dr. Pegden's Simulations for Each non-Frozen House District				hearsay, relevance, unfairly prejudicial
LDTX093	Thomton Figure 3. Comparison of the Enacted Map and the Average Across Dr. Pegden's Simulations for Each non-Frozen Senate District				hearsay, relevance, unfairly prejudicial
LDTX094	Thomton FN35 Table - Results of Dr. Pegden's Two Proportions Tests				hearsay, relevance, unfairly prejudicial
LDTX095	Thomton FN36 Table - Results of Dr. Chen's Two Proportions Tests				hearsay, relevance, unfairly prejudicial
LDTX096	Thomton FN37 Table - Results of Dr. Mattingly's Two Proportions Tests				hearsay, relevance, unfairly prejudicial
LDTX097	Thomton Table 1. North Carolina Statewide Elections Included by Each Expert to Evaluate the Simulation Results				hearsay, relevance, unfairly prejudicial
LDTX098	Thomton Table 2. Democratic Vote Share for Commissioner of Insurance				
LDTX099	Thomton Table 3. Comparison of the Democratic House and Senate Districts of the Enacted Plan and the Simulated Maps Prepared by Dr. Pegden				hearsay, relevance, unfairly prejudicial
LDTX100	Thomton Table 4. Non-Frozen Districts with a Difference between the Estimated Party Based on the Simulations of Dr. Pegden and the Enacted Map				hearsay, relevance, unfairly prejudicial
LDTX101	Thomton Table 5. Comparison of the Democratic House and Senate Districts of the Enacted Plan and the Simulated Maps Prepared by Dr. Chen Using the 2010-2016 Composite Statewide Elections				hearsay, relevance, unfairly prejudicial
LDTX102	Thomton Table 6. Comparison of the Democratic House and Senate Districts of the Enacted Plan and the Simulated Maps Prepared by Dr. Mattingly Across the Different Statewide Elections that He Included				hearsay, relevance, unfairly prejudicial
LDTX103	Thomton Table 7. Estimated Democratic House Seats Calculated by Dr. Mattingly When the Elections are Restricted to Those Considered by the Legislature				
LDTX104	Barber Figure 1. Historical Partisan Composition of NC Legislature				Hearsay; Foundation
LDTX105	Barber Figure 2. A Simple Example of Districting and Voter Geographic Distributions				Hearsay; Foundation
LDTX106	Barber Figure 3. Statewide Vote to Legislature Seats Relationship				Hearsay; Foundation
LDTX107	Barber Figure 4. Population Density of VTDs in North Carolina (Persons per Square Mile)				Hearsay; Foundation
LDTX108	Barber Figure 5. Populations Density of Counties in North Carolina (Persons per Square Mile)				Hearsay; Foundation

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LDTX109	Barber Figure 6. Partisan Lean of VTDs in North Carolina				Hearsay; Foundation
LDTX110	Barber Figure 7. Partisan Lean of Counties in North Carolina				Hearsay; Foundation
LDTX111	Barber Figure 8. Relationship between Population Density and Democratic Vote				Hearsay; Foundation
LDTX112	Barber Figure 9. Proportion African American in North Carolina Counties				Hearsay; Foundation
LDTX113	Barber Table 1. Hypothetical Preferences of Voters and Votes Cast by State Legislator				Hearsay; Foundation
LDTX114	Barber Table 2. Elections Used in Partisan Index				Hearsay; Foundation
LDTX115	Barber Table 3. Regression Model of Population Density and Democratic Support				Hearsay; Foundation
LDTX116	Barber Table 4. Regression Model of Population Density and Democratic Support (weighted)				Hearsay; Foundation
LDTX117	Brunell Figure 1. 2016 Presidential Election Voting by County				Foundation
LDTX118	Brunell Table 1. Democratic Support in the Most Heavily Populated Counties				
LDTX119	Brunell Table 2. Counties and Votes for Clinton from 2016 Election				
LDTX120	Brunell Table 3. Counties and Votes for Trump from 2016 Election				
LDTX121	Hood Table 1. Comparison of Split Precincts by Plan				
LDTX122	Hood Table 2. Split Precincts by Redrawn County Groups, 2017				
LDTX123	Hood Table 3. House of Representatives-Mean Compactness Scores				
LDTX124	Hood Table 4. Senate-Mean Compactness Scores				
LDTX125	Hood Table 5. Incumbent Pairings, 2018				
LDTX126	Hood Table 6. 2017 North Carolina Legislative Seat Distribution				
LDTX127	Hood Table 7. 2018 North Carolina Legislative Results				
LDTX128	Hood Table 8. Challenged House Districts 2018 Election Outcomes by Partisan Vote Index				
LDTX129	Hood Table 9. Challenged Senate Districts 2018 Election Outcomes by Partisan Vote Index				
LDTX130	Hood Table 10. Republican Seats to Votes Ratios, 2018				
LDTX131	Hood Figure 1. North Carolina Partisan Distribution				
LDTX132	Hood Table 12. GOP Vote Index by Geographic Region				
LDTX133	Hood Table 13. Explaining Democratic Partisanship				
LDTX134	Hood Supplemental Table 1. House Incumbent Reelection Rate, 2018				
LDTX135	Hood Supplemental Table 2. Senate Incumbent Reelection Rate, 2018				
LDTX136	Hood Supplemental Figure 1. North Carolina Partisan Distribution, 2016				
LDTX137	Hood Supplemental Table 3. GOP Vote Index by Geographic Region, 2016				
LDTX138	Hood Supplemental Table 4. Explaining Democratic Partisanship, 2016				
LDTX139	Hood Supplemental Table 5. Partisan Seats held in North Carolina General Assembly				
LDTX140	Hood Vote Comparisons - Counties and County Groupings				Undisclosed expert opinion and work product
LDTX141	Hood House - Professor Chen's Figure 2: House Simulation Set 1				Undisclosed expert opinion and work product
LDTX142	Hood House II - Professor Chen's Figure 2: House Simulation Set 1				Undisclosed expert opinion and work product
LDTX143	Hood Senate - Professor Chen's Figure 14: Senate Simulation Set 1				Undisclosed expert opinion and work product
LDTX144	Hood Senate II - Professor Chen's Figure 14: Senate Simulation Set 1				Undisclosed expert opinion and work product
LDTX145	Hood Enacted House and Senate Districts 2018 Election Outcomes by Democratic Support Scores				Undisclosed expert opinion and work product
LDTX146	Hood House Enacted Districts Classified by Democratic Support Scores				Undisclosed expert opinion and work product
LDTX147	Hood Senate Enacted Districts Classified by Democratic Support Scores				Undisclosed expert opinion and work product
LDTX148	November 27, 2017 Report, "Pennsylvania Congressional districting is an outlier: Expert Report by Wesley Pegden"		Pegden Exhibit 6	11/27/2017	Hearsay; Relevance
LDTX149	Wake - Commands		Pegden Exhibit 8		Hearsay
LDTX150	Article, The boogeyman in American politics, The Asheville Citizen-Times, May 8, 2016		Cooper Exhibit 3	5/8/2016	Hearsay; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX151	Article, Partisan Change in Southern State Legislatures, 1953-2013, Summer 2014		Cooper Exhibit 5		Hearsay; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX152	Article, N.C. counties shift to red, The Raleigh News & Observer, March 14, 2013		Cooper Exhibit 6	3/14/2013	Hearsay; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX153	Article, Redistricting 101: An FAQ on a current political issue, The Asheville Citizen-Times, July 17, 2011		Cooper Exhibit 7	7/17/2011	Hearsay; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX154	Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures by Jowel Chen and Jonathan Rodden, Quarterly Journal of Political Science, 2013		Chen Exhibit 1	1/13/2013	Hearsay; Relevance
LDTX155	2017 House and Senate Plans Criteria		Chen Exhibit 4		
LDTX156	Figure 1: Example of a Computer-Simulated House Map From House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria)		Chen Exhibit 8		
LDTX157	Number of Unique Maps by House County Grouping		Chen Exhibit 9		Undisclosed expert opinion and work product
LDTX158	Number of Unique Maps by Senate County Grouping		Chen Exhibit 10		Undisclosed expert opinion and work product
LDTX159	Special Master's Recommended Plan for the NC Senate and House of Representatives		Chen Exhibit 11	1/5/2018	
LDTX160	Handwritten list of file names		Chen Exhibit 14		
LDTX161	List of folders for NC House J-25 003(20170628).bak.zip		Chen Exhibit 15		Foundation; Hearsay
LDTX162	Figure 94 - Number of Senate Districts With At Least SD-48's Republican Vote Share of 57.21% in the Buncombe-Henderson-Transylvania County Grouping		Chen Exhibit 17		
LDTX163	North Carolina General Assembly organizational chart		Owen Exhibit 3	9/20/2017	Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice

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LDTX164	New Voter Welcome Letters		Owen Exhibit 4		Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX165	Excel Spreadsheets - House and Senate Readings		Owen Exhibit 5		Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX166	153rd Session, 2017-2018, House of Representatives sheet		Owen Exhibit 6	9/24/2018	Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX167	2017 NC House of Representatives Members District List		Owen Exhibit 7	10/11/2018	Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX168	NC General Assembly Senate, 2017 Session		Owen Exhibit 8	8/14/2018	Hearsay; Authentication; Foundation; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
LDTX169	Chart, Republican Proportion of Statewide Vote		Barber Exhibit 8		Hearsay; Relevance and Substantially Outweighed by Danger of Unfair Prejudice; Undisclosed Expert Opinion
LDTX170	Number of Unique Maps by House County Grouping		Thornton Exhibit 7		hearsay, relevance, unfairly prejudicial Undisclosed expert opinion and work product
LDTX171	Number of Unique Maps by Senate County Grouping		Thornton Exhibit 8		hearsay, relevance, Undisclosed expert opinion and work product
LDTX172	Article, Redistricting: Drawing the Line, May 8, 2017		Mattingly Exhibit 4	5/8/2017	hearsay
LDTX173	Screen Shots of Folders - NC Legislature Data		Mattingly Exhibit 5		
LDTX174	Leon Schaller - Voter Search records, NC State Board of Elections		Schaller Exhibit 1		
LDTX175	04/12/17 Email to Gene Ferrell from Leon Schaller, subject "Re: Alamance Democratic Party Convention"	NC-L-SCHALLER-000010	Schaller Exhibit 2	4/12/2017	
LDTX176	District Map Viewer		Schaller Exhibit 3		
LDTX177	02/18/15 Email to Dennis Riddell from Leon Schaller, subject "Re: House Bill 92"	NC-L-SCHALLER-000007	Schaller Exhibit 5	2/18/2015	
LDTX178	01/08/19 Email to Leon Schaller from Common Cause, subject "Re: We're going to the Supreme Court"	NC-L-SCHALLER-000015 to NC-L-SCHALLER-000017	Schaller Exhibit 6	1/8/2019	
LDTX179	Map: Forsyth County State Senate Districts 31 and 32		Johnson Exhibit 3		
LDTX180	Map: Forsyth County State House Districts 71, 72, 73, 74, 75		Johnson Exhibit 4		
LDTX181	Map: 826 Lexington Avenue, High Point, NC		Brown Exhibit 1		
LDTX182	08/24/18 Email to jobrown_sgc@yahoo.com from caroline@earls4justice.com, subject "Poll Results"	NC-J-BROWN-000995 to NC-J-BROWN-000996	Brown Exhibit 2	8/24/2018	Relevance, Hearsay
LDTX183	Map: NC House Districts		Brown Exhibit 3		
LDTX184	Map: NC Senate Districts		Brown Exhibit 5		
LDTX185	Derrick Miller's Objections and Responses to Interrogatories and Requests for Production of Documents		Miller Exhibit 1		
LDTX186	Derrick Miller's tweet and reply from 01/10/18		Miller Exhibit 3	1/10/2018	
LDTX187	Derrick Miller's tweet from 09/28/18		Miller Exhibit 4	9/28/2018	
LDTX188	Derrick Miller's tweet from 06/19/17		Miller Exhibit 5	6/19/2017	
LDTX189	Screenshots of tweets from Derrick Miller's Twitter account in October 2018		Miller Exhibit 6		
LDTX190	Map showing Wilmington		Miller Exhibit 7		
LDTX191	Map - 409 7th Street S Wilmington, NC		Miller Exhibit 8		
LDTX192	03/04/17 document entitled "A Resolution Calling for Non-Partisan Redistricting in North Carolina"	NC-D-MILLER 001242	Miller Exhibit 9	3/4/2017	
LDTX193	03/04/17 document entitled "A Resolution Calling for North Carolina to Enter the National Popular Vote Interstate"	NC-D-MILLER 001241	Miller Exhibit 10	3/4/2017	
LDTX194	11/07/17 Screenshot from Derrick Miller's Twitter account		Miller Exhibit 11	11/7/2017	
LDTX195	06/14/18 Screenshot from Derrick Miller's Twitter account		Miller Exhibit 12	6/14/2018	
LDTX196	Board of Elections voter information on Derrick Miller		Miller Exhibit 13	5/13/2019	
LDTX197	08/06/18 Email from anita@earls4justice.com to Derrick Miller subject "A North Carolina where everyone has a vote"		Miller Exhibit 14	8/6/2018	Relevance, Hearsay
LDTX198	04/10/2017 Email from Progressive Chang Campaign Committee to Derrick Miller, subject "Thank You for Applying to a PCCC Candidate Training"	NC-D-MILLER 000890 to NC-D-MILLER 000892	Miller Exhibit 15	4/10/2017	

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Exhibit Number	Exhibit Description	Bates Number	Deposition Exhibit Number	Document Date	Plaintiffs' Objections
LDTX199	Facebook Page - 11/16/2018 Article "Democrats Are Poised to Wipe Out Republicans' North Carolina Gerrymandering in Time for the 2020 Election"		Quick Exhibit 1	11/16/2018	
LDTX200	04/11/2018 Email dated from Real Facts NC (ncrealfacts@gmail.com) to Kimberly Reynolds	NCDP_0023108 to NCDP_0023121	Quick Exhibit 2	4/11/2018	
LDTX201	11/03/2017 Email from David D. Brown (dtechnical@aol.com) to repsalex@yahoo.com; realex_ander@yahoo.com	NC-D-Brown-000141 to NC-D-Brown-000163	Quick Exhibit 3	11/3/2017	
LDTX202	Lily Nicole Quick's Objections and Responses to Interrogatories and Requests for Production of Documents		Quick Exhibit 4	3/18/2019	
LDTX203	Facebook Post - July 11, 2017 Repost DNC Member Chris Reeves announcement		Quick Exhibit 5	7/11/2017	
LDTX204	North Carolina State Board of Elections Registration Numbers - House District 59		Quick Exhibit 7		
LDTX205	County Map - Special Master's Recommended House Plan: Guilford County		Quick Exhibit 8	12/1/2017	
LDTX206	Twitter Post - 02/06/2018 replying to Chris Hayes "gerrymandered districts"		Quick Exhibit 9	2/6/2018	
LDTX207	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives District 60		Quick Exhibit 10		
LDTX208	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives District 61		Quick Exhibit 11		
LDTX209	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives District 57		Quick Exhibit 12		
LDTX210	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives District 59		Quick Exhibit 13		
LDTX211	County Map - District 59		Quick Exhibit 14		
LDTX212	11/08/2016 Official General Election Results-Statewide for the North Carolina House of Representatives District 58		Quick Exhibit 15		
LDTX213	11/04/2014 Official General Election Results-Statewide for the North Carolina House of Representatives District 58		Quick Exhibit 16		
LDTX214	11/06/2012 Official General Election Results-Statewide for the North Carolina House of Representatives District 58		Quick Exhibit 17		
LDTX215	11/06/2018 Official General Election Results-Statewide for the North Carolina House of Representatives District 58		Quick Exhibit 18		
LDTX216	Party Registration Statistics - Guilford County		Quick Exhibit 19		
LDTX217	Notice of 30(b)(6) Deposition of North Carolina Democratic Party		Goodwin Exhibit 1	5/6/2019	
LDTX218	Spreadsheet showing State Party Spending for House Districts in 2018		Goodwin Exhibit 3		
LDTX219	Spreadsheet showing State Party Spending for Senates Districts in 2018		Goodwin Exhibit 4		
LDTX220	Political Committee Disclosure Report -2016 Fourth Quarter		Goodwin Exhibit 5	3/24/2017	
LDTX221	Political Committee Disclosure Report -2018 Fourth Quarter		Goodwin Exhibit 6	1/10/2019	
LDTX222	State House District 2 Snapshot - 2016 & 2018 Data	NCDP-0000170 and NCDP-0000290	Goodwin Exhibit 7		
LDTX223	Conference Call Invitation Emails	NCDP-0006341 to NCDP-0006364	Goodwin Exhibit 12	9/27/2018	Relevance; Foundation
LDTX224	08/24/2017 Email from Ryan Deeter to Jill Simkin, subject "RE: maps" and attachment (designated highly confidential)	NCDP-0022524	Goodwin Exhibit 15	8/21/2017	Hearsay; Foundation
LDTX225	07/19/2017 Email from Robert Howard to Carla Marin, subject "ICYMI Break the Majority Unites Democrats to Retake N.C. Legislature" (designated confidential)	NCDP-0000772 to NCDP-0000775	Goodwin Exhibit 16	7/19/2017	
LDTX226	Notice of Rule 30(b)(5) Deposition of North Carolina Common Cause		Phillips Exhibit 1	5/6/2019	
LDTX227	Meeting Notes	CC-01373	Phillips Exhibit 2		Hearsay
LDTX228	List of Possible Commission Members	CC-01386	Phillips Exhibit 3		
LDTX229	Letter dated 03/15/17, addressed to Rep. Holloway	CC-00073	Phillips Exhibit 4; Gilkeson Exhibit 3	3/15/2017	Foundation; Hearsay
LDTX230	Voting Rights Act Analysis	CC-00092	Phillips Exhibit 5		
LDTX231	Spreadsheet Showing Campbell VRA House Districts and "Black VAP%," "Black VR%," "Black Dem %," and "2017 Lawsuit"	CC-01376	Phillips Exhibit 6; Gilkeson Exhibit 4		
LDTX232	Spreadsheet showing Various 18 District Representatives and "Black VAP%," "Black VR%,"	CC-01374 to CC-01375	Phillips Exhibit 7; Gilkeson 7		
LDTX233	Table 1: Spreadsheet showing Various County Representatives and "Democratic Voter Registration," "Black Voting Age," "Black Voting Registration," and "Black Dem%"	CC-01377 to CC-01378	Phillips Exhibit 8		
LDTX234	Voting Rights Act Talking Points	CC-00061 to CC-00062	Phillips Exhibit 9; Gilkeson Exhibit 8		
LDTX235	Litigation Surrounding North Carolina Redistricting Plans	CC-00063 to CC-00065	Phillips Exhibit 10; Gilkeson 9		

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Exhibit Number	Exhibit Description	Bates Number	Deposition Exhibit Number	Document Date	Plaintiffs' Objections
LDTX236	08/30/2017 Email Chain ending with email from Jane Pinsky, subject "Fwd: gerymandering"	CC-00813 to CC-00814	Phillips Exhibit 11	8/30/2017	Hearsay; Relevance
LDTX237	08/21/2017 Email Chain ending with email from David Meeker, subject "Re: Initial reaction on maps?"	CC-00948 to CC-00949	Phillips Exhibit 12	8/21/2017	
LDTX238	INFO from Democracy NC	CC-01079 to CC-01081	Phillips Exhibit 13		Foundation; Relevance; Hearsay
LDTX239	Common Cause Senate Simulation with Group Overlay map		Phillips Exhibit 14; Gilkeson Exhibit 6		
LDTX240	Common Cause House Simulation with Group Overlay map		Phillips Exhibit 15; Gilkeson Exhibit 5		
LDTX241	Letter dated June 29, 2017, from Bob Phillips to United States District Court Judges Wynn, Schroder and Eagles		Phillips Exhibit 18	6/29/2017	
LDTX242	Statistics Package		Phillips Exhibit 19		
LDTX243	Plaintiff Common Cause's Objections and Responses to Legislative Defendants' First Set of Interrogatories and Requests for Production of Documents		Phillips Exhibit 20	3/18/2019	
LDTX244	Expert Report of Dr. Chen from <i>Common Cause v. Rucho</i>				Hearsay, Relevance
LDTX245	Richard H. Pildes & Richard G. Niemi, Expressive Harms, "Bizarre Districts," And Voting Rights: Evaluating Election-District Appearances after Shaw v. Reno, 92 Mich. L. Rev. 483 (Dec. 1993)				Hearsay, Authentication, Foundation, Undisclosed expert opinions and work product
LDTX246	HIGHLY CONFIDENTIAL OUTSIDE ATTORNEYS' EYES ONLY - NCDP District-Level Support Scores				
LDTX247	Explanation of Support Scores - Submitted to Court for In Camera Inspection				
LDTX248	NCDP State Senate District Snapshots for 2018 (designated Confidential)	NCDP_000000 1 to 51			
LDTX249	NCDP State House District Snapshots for 2016 (designated Confidential)	NCDP_000052 to 171			
LDTX250	NCDP State House District Snapshots for 2018 (designated Confidential)	NCDP_000017 2 to 291			
LDTX251	NCDP State Senate District Snapshots for 2018 (designated Confidential)	NCDP_000029 2 to 342			
LDTX252	07/25/2017 Email from Frederick Aikens to William R. Gilkeson, Eddie Speas, Scott Falmlen, Anita Earles, Daniel T. Blue, subject "Fwd: Redistricting Committee: Legislative District Plans Criteria" and attachment (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 01 to GILKES ON_00 03		7/25/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX253	07/31/2017 Email from Frederick Aikens to Eddie Speas, William R. Gilkeson, and Ben Clark, subject "Fwd: Redistricting Criteria V6" and attachment (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 04 to GILKES ON_00 06		7/31/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX254	07/19/2017 Email from Frederick Aikens to William R. Gilkeson, Eddie Speas, Scott Falmlen, Anita Earles, Daniel T. Blue, subject "Remaining Schedule for Senate Dems" and attachment (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 07 to GILKES ON_00 08		7/19/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX255	07/19/2017 Email from Frederick Aikens to William R. Gilkeson, Eddie Speas, Scott Falmlen, Senator Ben Clark, subject "Re: Contact Information Request" and attachment (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 09		7/19/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX256	08/19/2017 Email from Rep. Pricey Harrison to Bill Gilkeson, Scott Falmlen, Casey Wilkinson, subject "Fwd: Proposed 2017 House Redistricting Plan" (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 10		8/19/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX257	Text messages produced by Bill Gilkeson (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 11 to GILKES ON_00 14		8/20/2017	Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX258	Handwritten notes produced by Bill Gilkeson	GILKES ON_00 15			Rule 45d1; Hearsay; Authentication; Foundation; Relevance, Privilege
LDTX259	Chart comparing data for 2011 Enacted Senate Plan and 2017 Final Remedy Plan (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 16			Rule 45d1; Hearsay; Authentication; Foundation; Privilege
LDTX260	Chart comparing data for 2011 Enacted House Plan and 2017 Postfinal Remedy House Plan (designated Highly Confidential - Attorney Eyes Only)	GILKES ON_00 17			Rule 45d1; Hearsay; Authentication; Foundation; Privilege
LDTX261	Map 6 - Comparison of 2011 Enacted to Optimum House County Groups	GILKES ON_00 18		10/28/2016	Rule 45d1; Hearsay
LDTX262	Map 3 - Comparison of 2011 Enacted to Optimum Senate County Groups	GILKES ON_00 19		10/28/2016	Rule 45d1; Hearsay
LDTX263	RBD 2017A - Field Key			2/17/2017	
LDTX264	RBD 2017HS - Field Key			8/9/2017	
LDTX265	Session Law 2019-46, House Bill 1017, General Assembly of North Carolina Session 2019				



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LDTX266	Audio Recording of August 28, 2017 House Session (available at <a href="https://www.ncleg.gov/Documents/9#2017-2018%20Session/Audio%20Archives">https://www.ncleg.gov/Documents/9#2017-2018 Session/Audio Archives</a> (2017))				Hearsay, Foundation, Cumulative
LDTX267	Audio Recording of August 30, 2017 House Session (available at <a href="https://www.ncleg.gov/Documents/9#2017-2018%20Session/Audio%20Archives">https://www.ncleg.gov/Documents/9#2017-2018 Session/Audio Archives</a> (2017))				Hearsay, Foundation, Cumulative
LDTX268	Audio Recording of August 31, 2017 House Session (available at <a href="https://www.ncleg.gov/Documents/9#2017-2018%20Session/Audio%20Archives">https://www.ncleg.gov/Documents/9#2017-2018 Session/Audio Archives</a> (2017))				Hearsay, Foundation, Cumulative
LDTX269	Clip of Video Recording of August 28, 2017 House Session (full recording available at <a href="https://www.wral.com/news/state/nccapitol/video/16911676/">https://www.wral.com/news/state/nccapitol/video/16911676/</a> )				Hearsay, Foundation, Cumulative
LDTX270	Audio Recording of August 30, 2017 Senate Session				Hearsay, Foundation, Cumulative
LDTX271	Changes: 2017 Enacted to Common Cause House and Senate Districts				Hearsay; Authentication; Foundation; Relevance,
LDTX272	Lewis Figure 1. Example of Ecological Regression				
LDTX273	Lewis Figure 2. Distribution of 2016 Democratic primary election voters by race/ethnicity and location				
LDTX274	Lewis Table 1. List of Contests Analyzed				
LDTX275	Lewis Table 2. Analysis of Selected Democratic Primary Election Contests and Areas				
LDTX276	Lewis Table 3. Analysis of Selected General Election Contests and Areas				
LDTX277	Lewis Table 4. Analysis of a Hypothetical 2016 General Election Contest in Various Areas				Failure to disclose correct numbers and backup data
LDTX278	2018 House District New Lines Support Scores, Competitiveness and Break the Majority Financial Spend				Hearsay; Authenticity; Foundation; Undisclosed expert opinions and work product
LDTX279	2018 Senate District New Lines Support Scores, Competitiveness and Break the Majority Financial Spend				Hearsay; Authenticity; Foundation; Undisclosed expert opinions and work product
LDTX280	2018 Results and Registration Statistics				Hearsay; Authenticity; Foundation; Undisclosed expert opinions and work product
LDTX281	2018 Results and Support Scores				Hearsay; Authenticity; Foundation; Undisclosed expert opinions and work product; must be marked Highly Confidential
* Plaintiffs reserve the right to raise additional objections on foundation or other grounds depending on how Defendants attempt to introduce and admit specific exhibits					

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<u>Exhibit Number</u>	<u>Exhibit Description</u>	<u>Bates Number</u>	<u>Deposition Exhibit Number</u>	<u>Document Date</u>	<u>Plaintiffs' Objections</u>
1	Barber Figure 1. Historical Partisan Composition of NC Legislature				
2	Barber Figure 2-1 Simple Example of Districting and Voter Geographic Distributions: Hypothetical State 1				
3	Barber Figure 2-2 Simple Example of Districting and Voter Geographic Distributions: Hypothetical State 2				
4	Barber Figure 2-3 Simple Example of Districting and Voter Geographic Distributions: Hypothetical State 3				
5	Barber Figure 3-1 Relationship Between Statewide Democratic Vote to Democratic Legislative Seats, 1970-2018				
6	Barber Figure 3-2 Relationship Between Statewide Democratic Vote to Democratic Legislative Seats, 1970-2018 (Zoomed In)				
7	Barber Figure 4 Population Density of VTDs in North Carolina				
8	Barber Figure 5 Population Density of Counties in North Carolina				
9	Barber Figure 6 Partisan Lean of VTDs in North Carolina				
10	Barber Figure 7 Partisan Lean of Counties in North Carolina				
11	Barber Figure 8-1 Relationship Between Population Density and Democratic Vote for VTDs				
12	Barber Figure 8-2 Relationship Between Population Density and Democratic Vote for Counties				
13	Barber Figure 9 Proportion African American in North Carolina Counties				
14	Barber Table 1 Hypothetical Preferences of Voters and Votes Cast by State Legislator				
15	Barber Table 2 Elections Used in Partisan Index				
16	Barber Table 3 Regression Model of Population Density and Democratic Support				
17	Barber Table 4 Regression Model of Population Density and Democratic Support (Weighted)				
18	Barber Demonstrative - Propensity House Summary				Hearsay; Foundation; Undisclosed Expert Opinion and Work Product; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
19	Barber Demonstrative - Propensity House				Hearsay; Foundation; Undisclosed Expert Opinion and Work Product; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
20	Barber Demonstrative - Propensity Senate Summary				Hearsay; Foundation; Undisclosed Expert Opinion and Work Product; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
21	Barber Demonstrative - Propensity Senate				Hearsay; Foundation; Undisclosed Expert Opinion and Work Product; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
22	Barber Deposition Exhibit 6 - US Census Bureau Map of rural and urban areas				

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<u>Exhibit Number</u>	<u>Exhibit Description</u>	<u>Bates Number</u>	<u>Deposition Exhibit Number</u>	<u>Document Date</u>	<u>Plaintiffs' Objections</u>
23	Barber Deposition Exhibit 8 - Demonstrative Exhibits (Higher Resolution Page 1 Included)				Hearsay; Foundation; Undisclosed Expert Opinion and Work Product; Relevance and Substantially Outweighed by Danger of Unfair Prejudice
24	June 26, 2019 printout of Alamance County 2018 Senate Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
25	June 26, 2019 printout of Alamance County 2018 House Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
26	Alamance County 2011 Senate Districts from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
27	Alamance County 2011 House Districts from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
28	June 26, 2019 printout of Forsyth County 2018 Senate Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
29	June 26, 2019 printout of Forsyth County 2018 House Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
30	Forsyth County 2011 Senate Districts from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
31	Forsyth County 2011 House Districts from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
32	June 26, 2019 printout of Harnett County 2018 Senate Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
33	June 26, 2019 printout of Harnett County 2018 House Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Mapviewer">https://www.ncleg.gov/RnR/Redistricting/Mapviewer</a>				
34	Harnett County 2011 Senate Districts from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
35	Harnett County 2011 House Districts from the North Carolina General Assembly's District Map Viewer at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
36	2003 Plan Senate District 22 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
37	2003 Plan Senate District 24 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
38	2003 Plan Senate District 31 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
39	2003 Plan Senate District 32 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
40	2003 Plan House District 51 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
41	2003 Plan House District 53 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
42	2003 Plan House District 64 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
43	2003 Plan House District 71 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
44	2003 Plan House District 72 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
45	2003 Plan House District 73 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				

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46	2003 Plan House District 74 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
47	2003 Plan House District 75 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
48	2009 Plan House District 51 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
49	2009 Plan House District 53 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
50	2009 Plan House District 64 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
51	2009 Plan House District 71 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
52	2009 Plan House District 72 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
53	2009 Plan House District 73 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
54	2009 Plan House District 74 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
55	2009 Plan House District 75 from the North Carolina General Assembly's Redistricting Archives at <a href="https://www.ncleg.gov/RnR/Redistricting/Archives">https://www.ncleg.gov/RnR/Redistricting/Archives</a>				
56	June 26, 2019 printout of Burlington and Surrounding Areas Map with Precincts from the Alamance County GIS Website at <a href="https://apps.alamance-nc.com/CountyGISMap/default.aspx">https://apps.alamance-nc.com/CountyGISMap/default.aspx</a>				
57	June 26, 2019 printout of Alamance Counties Municipalities and ETJ Map from the Alamance County GIS Website at <a href="https://apps.alamance-nc.com/CountyGISMap/default.aspx">https://apps.alamance-nc.com/CountyGISMap/default.aspx</a>				
58	June 26, 2019 printout of Forsyth Municipalities Map from the Forsyth County GIS Website at <a href="http://www.forsyth.cc/tax/geodata.aspx">http://www.forsyth.cc/tax/geodata.aspx</a>				
59	October 2016 Forsyth County County Commissioner Districts Map from Forsyth County Website at <a href="https://www.forsyth.cc/elections/district_maps.aspx">https://www.forsyth.cc/elections/district_maps.aspx</a>				
60	October 2016 Forsyth County School Board Districts Map from Forsyth County Website at <a href="https://www.forsyth.cc/elections/district_maps.aspx">https://www.forsyth.cc/elections/district_maps.aspx</a>				
61	July 2, 2019 printout of Voter Lookup record for Intervenor-Defendant Carolyn Elmore, from the North Carolina State Board of Elections at <a href="https://vt.ncsbe.gov/RegLkup/">https://vt.ncsbe.gov/RegLkup/</a>				
62	June 26, 2019 printout of Voter Lookup record for Intervenor-Defendant Connor Groce, from the North Carolina State Board of Elections at <a href="https://vt.ncsbe.gov/RegLkup/">https://vt.ncsbe.gov/RegLkup/</a>				
63	June 26, 2019 printout of Voter Lookup record for Intervenor-Defendant Reginald Reid, from the North Carolina State Board of Elections at <a href="https://vt.ncsbe.gov/RegLkup/">https://vt.ncsbe.gov/RegLkup/</a>				
64	June 26, 2019 printout of Voter Lookup record for Intervenor-Defendant Ben York, from the North Carolina State Board of Elections at <a href="https://vt.ncsbe.gov/RegLkup/">https://vt.ncsbe.gov/RegLkup/</a>				
65	June 24, 2019 Affidavit of Intervenor-Defendant Aubrey Otis Woodard				
66	June 25, 2019 Affidavit of Intervenor-Defendant Rev. Cathy Ann Williams Fanslau				
67	June 27, 2019 Affidavit of Intervenor-Defendant Adrain Arnett				
68	June 25, 2019 printout of 2002 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				
69	June 25, 2019 printout of 2004 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				
70	June 25, 2019 printout of 2006 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				
71	June 25, 2019 printout of 2008 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				
72	June 25, 2019 printout of 2010 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				
73	June 25, 2019 printout of 2012 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a>				


**Common Cause, et al., v. Lewis, et al., Wake County Superior Court 18 CVS 014001  
Plaintiffs' Objections to Intervenor Defendants' Exhibits**

<u>Exhibit Number</u>	<u>Exhibit Description</u>	<u>Bates Number</u>	<u>Deposition Exhibit Number</u>	<u>Document Date</u>	<u>Plaintiffs' Objections</u>
74	June 25, 2019 printout of 2014 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
75	June 25, 2019 printout of 2016 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
76	June 25, 2019 printout of 2018 Harnett County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
77	June 25, 2019 printout of 2002 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
78	June 25, 2019 printout of 2004 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
79	June 25, 2019 printout of 2006 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
80	June 25, 2019 printout of 2008 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
81	June 25, 2019 printout of 2010 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
82	June 25, 2019 printout of 2012 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
83	June 25, 2019 printout of 2014 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
84	June 25, 2019 printout of 2016 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
85	June 25, 2019 printout of 2018 Alamance County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
86	June 25, 2019 printout of 2002 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
87	June 25, 2019 printout of 2004 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
88	June 25, 2019 printout of 2006 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
89	June 25, 2019 printout of 2008 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
90	June 25, 2019 printout of 2010 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
91	June 25, 2019 printout of 2012 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
92	June 25, 2019 printout of 2014 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
93	June 25, 2019 printout of 2016 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
94	June 25, 2019 printout of 2018 Forsyth County General Election Results from the North Carolina State Board of Elections at <a href="https://www.ncsbe.gov/Election-Results">https://www.ncsbe.gov/Election-Results</a> .				
95	Elmore 14-17: Emails between M. Coggins and C. Elmore				Relevance, Hearsay
96	HIGHLY CONFIDENTIAL OUTSIDE ATTORNEYS' EYES ONLY - NCDP District-Level Support Scores				
97	Explanation of Support Scores - Submitted to Court for In Camera Inspection				
98	Dr. Michael Barber Curriculum Vitae				
* Plaintiffs reserve the right to raise additional objections on foundation or other grounds depending on how Defendants attempt to introduce and admit specific exhibits.					

Respectfully submitted this the 8th day of July, 2019

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**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:

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This the 8th day of July, 2019.

  
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