

STATE OF NORTH CAROLINA
COUNTY OF WAKE

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

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.

**PLAINTIFFS' OPPOSITION
TO LEGISLATIVE
DEFENDANTS' MOTION
TO EXCLUDE FILES AND
MATERIALS PRODUCED
BY STEPHANIE LIZON**

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INTRODUCTION

The Court should deny Legislative Defendants' motion to exclude, both for the reasons explained in Plaintiffs' motion *in limine* to admit the relevant Hofeller files and for the additional reasons explained below. Plaintiffs can readily establish authentication and chain of custody for the relevant Hofeller files, and the testimony of Plaintiffs' experts about those files properly rebuts the opinions offered by Legislative Defendants' experts. Although Legislative Defendants complain that they have not had long enough to review the Hofeller files, they are accountable for the delay in the files being made available. All of these files are public records under state law and Dr. Hofeller's contract to draw the 2017 Plans, and Legislative Defendants are responsible for failing to ensure that the records were made public in August 2017 when they should have been. Moreover, Legislative Defendants have had the files for nearly two months, and they would have had these particular files months earlier had they been willing to accept them while litigating the copying of personal files. In any event, Legislative Defendants attached to their motion *in limine* a rebuttal report by their expert Dr. Johnson analyzing the Hofeller files. Although that report is untimely, to eliminate any conceivable claim of unfairness, Plaintiffs will not object to testimony by Dr. Johnson based on that late-filed expert report.

To aid the Court in its evaluation of this motion and Plaintiffs' own motion *in limine*, Plaintiffs attach in Exhibits 1 and 2 images from the specific Hofeller which Plaintiffs' experts relied upon and which Plaintiffs will seek to introduce into evidence at trial.

ARGUMENT

I. Plaintiffs Have Adequately Established Authenticity and Chain of Custody for the Relevant Hofeller Files Relied Upon by Plaintiffs' Experts

Legislative Defendants argue that "the chain of custody of the Hofeller documents is in doubt, as is their authenticity." Mot. to Exclude at 12. But Legislative Defendants notably do

not address the relevant Rules of Evidence, legal standards, or case law to support their position that the relevant files should be excluded for authenticity or chain of custody reasons. For good reason: the relevant rules, legal standards, and case law make clear that Plaintiffs can sufficiently establish authenticity and chain of custody to admit the relevant Hofeller files at trial.

With respect to authenticity, “the burden to authenticate under Rule 901 is not high—only a prima facie showing is required.” *State v. Ford*, 245 N.C. App. 510, 519, 782 S.E.2d 98, 105 (2016) (quoting *United States v. Hassan*, 742 F.3d 104, 133 (4th Cir. 2014)). “Indeed, the prima facie showing may be accomplished largely by offering circumstantial evidence that the documents in question are what they purport to be.” *Id.* Circumstantial and other evidence that the proponent may offer to authenticate materials include “[t]estimony that a matter is what it is claimed to be,” and “[a]pppearance, contents, substance, internal patterns, or other distinctive characteristics, taken in conjunction with circumstances.” N.C. R. Evid. 901(b)(2),(4).

As for chain of custody, “[a] detailed chain of custody need be established only when the evidence offered is not readily identifiable or is susceptible to alteration and there is reason to believe that it may have been altered.” *State v. Snead*, 368 N.C. 811, 815, 783 S.E.2d 733, 737 (2016) (internal quotation marks omitted). Even where establishing chain of custody is necessary, “any weak links in a chain of custody relate only to the weight to be given evidence and not to its admissibility.” *Id.* (internal quotation marks omitted); accord *McLean v. Mech.*, 116 N.C. App. 271, 279, 447 S.E.2d 459, 463 (1994).

Here, Plaintiffs have easily met their burden to establish prima facie authenticity of the relevant Hofeller files relied. To the extent demonstrating chain of custody is even necessary, *see id.*, Plaintiffs have done so through evidence including the testimony of Ms. Hofeller and the

attached affidavit of Jon Matthews from Plaintiffs' vendor Stroz Friedberg. If necessary, Mr. Matthews can also testify at trial to establish chain of custody.

A. Plaintiffs Have Established Authenticity

Plaintiffs' own motion *in limine* to admit the relevant Hofeller files sets forth in detail multiple reasons why those files are authentic. 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller at 6-9. Among those reasons: Ms. Hofeller recognized the storage devices as belonging to her father; she confirmed through photographs that the devices possessed by Plaintiffs' vendor are the ones she sent; the contents of the files on the devices could only have belonged to Dr. Hofeller and his wife; and the specific files that Plaintiffs will introduce at trial have metadata connecting those files to Dr. Hofeller. *See id.* In addition, Jon Matthews from Plaintiffs' vendor, Stroz Friedberg, attests in the attached affidavit—and can testify at trial, if needed—that all of the Hofeller files relied upon by Plaintiffs' experts come from the devices sent by Ms. Hofeller and have the names, files paths, and “last modified” and “last accessed” dates provided in the spreadsheet accompanying Mr. Matthews' affidavit. *See Ex. 3 ¶¶ 11-12 & Ex. B.* Since Plaintiffs filed their June 21 motion *in limine*, moreover, a federal district court in Maryland in the census litigation has found the Hofeller files authentic. The court found that the plaintiffs properly “authenticate[d] the documents found on Dr. Hofeller's computer” through “the deposition testimony of Dr. Hofeller's daughter taken in [the] North Carolina litigation.” *Kravitz v. Dep't of Commerce*, 2019 WL 2576353, at *6 (D. Md. June 24, 2019).

Legislative Defendants attempt to cast doubt on the authenticity of the Hofeller files by noting that a tiny percentage of the files apparently were copied onto the backup devices or opened from the backup devices after Dr. Hofeller's death. *See Mot. to Exclude* at 12-13. But critically, Legislative Defendants make no claim that *any* of the files relied upon by Plaintiffs' experts were modified, accessed, or copied onto the storage devices after Dr. Hofeller's death.

They were not. As Mr. Matthews details in his affidavit and an accompanying chart, all of the Hofeller files relied upon by Plaintiffs' experts were last modified, accessed, and backed up to the storage devices on or before *September 8, 2017*. Ex. 3 ¶ 12. As such, the finding of Legislative Defendants' vendor that certain files may have been opened or backed up after Dr. Hofeller's death cuts against Legislative Defendants for present purposes. It shows that, if a file was opened or backed up after Dr. Hofeller's death, it would be discernible from the metadata, but the metadata reveals that is not the case for *any* of the files relied upon by Plaintiffs' experts.

Regarding the files that were purportedly backed up or opened after Dr. Hofeller's death, Legislative Defendants misrepresent the meaning of this data. The data does nothing to show, as Legislative Defendants claim, "that many documents on Dr. Hofeller's files were tampered with and potentially changed." Mot. to Exclude at 12. The "Last Written" and "Entry Modified" timestamps cited by Legislative Defendants' vendor correspond to the time when the file was copied onto the storage device, not when the file itself was opened or modified. Ex. 3 ¶ 13. Indeed, all of the files backed up on August 25, 2018 were "Last Written" onto the device within several minutes of one another, indicating a bulk and/or automated backup.¹ *Id.* With respect to the several files that Legislative Defendants' vendor asserts were "interacted with" starting on October 13, 2018, that is fully consistent with Stephanie Hofeller's deposition testimony. She testified that, after she obtained the devices on October 11, 2018, she opened some personal and family-related files like "trust documents." Ex. 4 at 30:24-31:6, 82:20-85:23. She did not, however, "spend a lot of time looking at [her] father's work files," and more importantly, she did not "change or manipulate any of the files on the storage devices." *Id.* at 30:24-31:6, 82:20-

¹ Of note, almost all of the files backed up on this date appear to have been in a folder on Dr. Hofeller's computer titled "Transfer." Ex. 3 ¶ 13.

85:23. Again, there is not a scintilla of evidence that Ms. Hofeller or anyone else modified—or even opened—any of the files that Plaintiffs’ experts relied upon and will address at trial.

While the facts above should end the matter, it bears noting how fanciful any allegation that Ms. Hofeller modified the relevant files would be. Ms. Hofeller has no mapmaking or computer forensics expertise. To establish that any of the files were altered by Ms. Hofeller, Legislative Defendants would have to show not only that she somehow opened up the Maptitude program and manipulated the data within the Maptitude files on the storage devices, but also that she was somehow backdated all of the metadata associated with the files, including the last modified date, to make it appear that the files were last modified around the time when Dr. Hofeller was creating the relevant districts in 2011 and 2017. There is obviously no evidence of any of this, and Ms. Hofeller testified that she modified no files. Anyway, “the possibility” of such a sequence of events is far “too remote” to render “this evidence inadmissible.” *State v. Campbell*, 311 N.C. 386, 390-91, 317 S.E.2d 391, 393 (1984). Plaintiffs’ burden is “not high” and requires only a “prima facie showing” that “the documents in question are what they purport to be.” *Ford*, 245 N.C. App. at 519, 782 S.E.2d at 105 (2016) (internal quotation marks omitted). Plaintiffs have provided more than enough evidence to make that showing.

B. Plaintiffs Have Adequately Established Chain of Custody

Because there is no “reason to believe” that the relevant Hofeller files that Plaintiffs will use at trial “have been altered,” there is no requirement to establish “[a] detailed chain of custody.” *Snead*, 368 N.C. at 815, 783 S.E.2d at 737 (internal quotation marks omitted). But regardless, Plaintiffs have adequately established chain of custody and can do so at trial through live testimony if the Court finds it necessary.

First, Stephanie Hofeller’s deposition testimony establishes that she obtained the storage devices from her father’s room in her parents’ home, and that she sent those devices in a FedEx

package to Plaintiffs’ counsel in compliance with the subpoena. Ex. 4 at 14:18-25:9. Ms. Hofeller further testified, using photographs shown to her at the deposition, that the FedEx package and the devices inside received by Stroz Friedberg are the same ones that she sent. *Id.* The affidavit of Mr. Matthews—who can also testify live at trial, if needed—establishes that Stroz Friedberg received the sealed, unopened FedEx package from Plaintiffs’ counsel, found the 22 storage devices inside, and have forensically preserved and maintained control of the files on the devices since receiving. Ex. 3 ¶¶ 6-9. As Mr. Matthews states in his affidavit and can testify at trial, each of the files relied upon by Plaintiffs’ experts was saved onto one of the storage devices sent by Ms. Hofeller, and Stroz sent each of those files directly to one or more of Plaintiffs’ experts on specific dates from April to June 2019. *Id.* ¶¶ 11-12 & Ex. B. (Plaintiffs believe that Mr. Matthews’ testimony can be put on through his affidavit rather than taking up the parties’ and Court’s time at trial, but are prepared to have him take the stand to testify live if needed.) Plaintiffs’ experts, Dr. Chen and Dr. Cooper, will testify that each file analyzed in their reports was sent to them by Stroz Friedberg. All of this clearly establishes chain of custody.

Legislative Defendants’ assertion that Plaintiffs “refus[ed] to produce a chain of custody accounting” of the devices, Mot. to Exclude at 13, is false. Before Stroz Friedberg shipped complete copies of all of the files on the devices to each set of Defendants pursuant to the Court’s direction, Legislative Defendants requested that Plaintiffs provide “chain of custody forms,” “descriptions, names and photos of all media drives,” an “excel version of the PDF ‘index’ [that Plaintiffs] previously produced” but adding “the file size, and file extension,” and clarification regarding the file paths on the index that Plaintiffs had sent. Ex. 5 (5/2/19 email from P. Strach). Intervenor Defendants separately requested that Stroz Friedberg provide the

following information prior to shipping: “Hard Drive Description,” Serial Number,” “Passcode (if password protected),” “Client Matter,” and “Data Size.” Ex. 6 (5/2/19 email from J. Branch).

While Plaintiffs were under no obligation to do so,² Plaintiffs voluntarily provided the requested information in order to ensure full transparency. In the shipments to all three sets of Defendants, Stroz Friedberg included descriptions, names, and photos of all the original media. *See* Exs. 7, 8. Stroz Friedberg further provided all of the other detailed information that Intervenor Defendants requested, and Plaintiffs voluntarily provided Defendants an Excel version of the index listing over 75,000 files names, now including the file extensions and file sizes as Legislative Defendants had requested. Ex. 6 (5/2/19 email from D. Jacobson). While Plaintiffs notified Legislative Defendants that the specific Stroz *forms* they were seeking were proprietary work product, Plaintiffs advised that Stroz would provide an attestation to chain of custody in the shipment with the media. *Id.* Stroz Friedberg did just that in a cover letter included with the shipments, attesting that “[t]he media was received in a sealed FedEx box with no sign of tampering.” Ex. 7. Stroz also provided to each set of Defendants a spreadsheet with detailed information on each of the 22 devices that Ms. Hofeller had produced. Ex. 8.

In the two months since all Defendants received that documentation of the chain of custody from Stroz Friedberg, neither Legislative Defendants nor anyone else ever suggested that that documentation was insufficient—until Legislative Defendants’ June 21 motion. Nor do Legislative Defendants offer any legal support for the notion that a litigant must establish chain of custody through some specific type of “form” as opposed to simply having the custodian attest to the chain of custody, which is what Plaintiffs have previously provided to Legislative Defendants, are providing with this response, and can establish through live testimony if needed.

² Neither Legislative Defendants nor Intervenor Defendants ever issued any actual discovery request for this or any related information, and Rule 45(d1) on its face does not require that such information be provided.

II. Dr. Chen’s and Dr. Cooper’s Rebuttal Reports Properly Rebut Legislative Defendants’ Experts, and Legislative Defendants Cannot Claim Unfair Prejudice

Legislative Defendants argue that the portions of Dr. Chen’s and Dr. Cooper’s rebuttal reports that address the Hofeller files at issue “is not properly rebuttal material” because Dr. Chen and Dr. Cooper rely on “dozens of files that were not produced in the initial reports.” Mot. to Exclude at 14-15. Legislative Defendants further claim that they will suffer “prejudice” if Dr. Chen and Dr. Cooper are permitted to testify regarding this evidence. *Id.* at 16.

Legislative Defendants are wrong on both the facts and the law. “Rebuttal evidence is defined as evidence given to explain, repel, counteract, or disprove facts given in evidence by the opposing party.” *Charleston Med. Therapeutics, Inc. v. AstraZeneca Pharm. LP*, 2015 WL 12805687, at *2 (D.S.C. July 8, 2015) (internal quotation marks omitted). Thus, “rebuttal and reply reports may cite new evidence and data so long as the new evidence and data is offered to directly contradict or rebut the opposing party’s expert.” *Id.* (internal quotation marks omitted). A “Plaintiff is . . . permitted to respond to [a] Defendant’s report with new evidence that rebuts and counteracts the theory posed by Defendant.” *Stowers v. 529900 Ontario Ltd.*, 2018 WL 1528215, at *4 (W.D. Va. Mar. 28, 2018); *accord Teledyne Instruments, Inc. v. Cairns*, 2013 WL 5781274, at *17-18 (M.D. Fla. Oct. 25, 2013). Even where a rebuttal report exceeds the scope of the other party’s report, the analysis should not be excluded unless it would result in “unfair surprise” or prejudice. *State v. Jackson*, 810 S.E.2d 397, 402-03 (N.C. Ct. App. 2018).

Here, Dr. Chen’s and Dr. Cooper’s analyses relying upon the Hofeller files directly rebut the opinions of Legislative Defendants’ experts regarding Dr. Hofeller’s ability to use partisanship in drawing the 2017 Plans, and about whether and how the 2017 Plans comply with the General Assembly’s “Adopted Criteria.” Furthermore, Legislative Defendants cannot claim any unfair prejudice because they bear responsibility for the delay in their obtaining the files, and

because they have cured any purported prejudice through the submission of a further rebuttal report from their own expert which was submitted with their motion *in limine*.

A. Dr. Chen and Dr. Cooper Properly Rebutted the Opinions of Legislative Defendants’ Experts Regarding Partisan Intent and the Use of Partisanship

On April 30, Legislative Defendants served expert reports that set forth three primary theories regarding the question of partisan intent. Specifically, Legislative Defendants’ experts Dr. Johnson, Dr. Hood, and Dr. Brunell offered analyses and opinions that: (1) North Carolina’s redistricting rules, and in particular the Whole County Rule, constrained Dr. Hofeller’s ability to use partisanship in drawing the 2017 Plans; (2) purported natural clustering of Democratic voters in large metropolitan areas, and not an intentional effort by Dr. Hofeller to pack Democrats into districts, might be responsible for the overwhelmingly Democratic districts that exist in the 2017 Plans; and (3) discerning the partisan intent of a mapmaker is difficult and not established here.

The following are examples of some of the opinions and analyses offered by Legislative Defendants’ experts in support of these three theories:

- Dr. Johnson stated as follows:
 - “[T]he ‘county groupings’ requirement significantly limits the legislature’s ability to draw lines based exclusively on partisanship.” Ex. 9 at 13.
 - “Focusing on Mecklenburg County is a good way to see at a glance the impact of the restraint on districting imposed by the ‘county grouping’ rule and the Legislature’s criteria to minimize VTD and city splits and avoid extremely non-compact districts.” *Id.* at 10.
 - “An analysis of House districts in Wake County also demonstrates the limitations on partisan gerrymandering imposed by the ‘county grouping’ rule and by the Legislature’s criteria to minimize VTD and city splits and to avoid extremely non-compact districts.” *Id.* at 17.
 - “Once again, the state’s ‘county grouping’ rule, and the legislature’s desire to minimize city splits, acted as limit on the potential partisan motivations of legislators in North Carolina.” *Id.* at 24.

- “The state’s county groupings rule acts as a significant restriction on the discretion, and potential excesses, of legislators when they are in charge of redistricting.” *Id.*
- Dr. Hood stated as follows:
 - “North Carolina relies on a unique system to draw state legislative districts that is based on multiple rigid criteria. To a large extent, these criteria make drawing state legislative districts in the Tar Heel state a formulaic exercise.” Ex. 10 at 2.
 - “As indicated in my discussion of the legislative redistricting in North Carolina, the process is quite constrained, which greatly limits the ability of map drawers to create districts where partisan motives predominate.” *Id.* at 9-10
 - “To recap, this section has demonstrated that North Carolina’s political geography can affect the manner in which legislative districts are created. Geographically speaking, Republican areas tend to cluster with other Republican areas and Democratic areas tend to be located alongside other Democratic areas. . . The presence of such spatial patterns can lead to the phenomenon where voters with similar voting patterns are more likely to be placed together in the same district, sometimes referred to as *natural* packing.” *Id.* at 20.
- Dr. Brunell stated as follows:
 - “Divining the intent of the map-maker is extraordinarily difficult because the process of redistricting is complex. There are a multitude of competing demands at work when lines are being drawn – districts have to be nearly equally populated; districts need to be compact and contiguous; incumbents’ districts can be preserved; city and county splits need to be minimized; North Carolina’s county grouping rules must be complied with, and so on. Beyond these requirements there can be various other factors that affect where the boundaries are placed. . . . The complex process of redistricting makes drawing conclusions about the intent of the map-maker through statistical analyses incredibly difficult.” Ex. 11 at 7-8.
 - “North Carolina’s redistricting process is one of the most constrained in the nation due to the county groupings requirements.” *Id.* at 9.
 - “Democratic support is largely concentrated in the most heavily populated counties.” *Id.* at 10.

In their rebuttal reports, Dr. Chen and Dr. Cooper relied on certain of the Hofeller files to rebut these “conclusions” offered by Legislative Defendants’ experts. *Stowers*, 2018 WL 1528215, at *2. Each expert explained that the relevant Hofeller files show that Dr. Hofeller did

have discretion—and did use partisanship as his predominant motivation—in drawing districts *within* county clusters and *within* metropolitan areas with many Democratic voters.

As Dr. Chen reported, certain of Dr. Hofeller’s Excel spreadsheets show that, “[w]ithin each county grouping, . . . Dr. Hofeller’s consideration and analysis of different district boundaries was clearly focused primarily on partisan considerations.” 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 68 (emphasis added).³ “Aside from verifying that the districts adhere to county grouping boundaries, Dr. Hofeller’s spreadsheets analyze only the partisan characteristics of each district and the identities and partisanship of the incumbents in each district.” *Id.* Dr. Chen presented the following Excel spreadsheet as an example, showing how Dr. Hofeller considered alternative configurations *within* the Senate county grouping containing Johnston County, with an exclusive focus on partisanship:

³ Plaintiffs attached Dr. Chen’s and Dr. Cooper’s rebuttal reports to Plaintiffs’ own motion *in limine* to admit the Hofeller files, and cross-reference the exhibits attached to that filing.

**Chen Figure 46: Dr. Hofeller's Draft Plan File:
"Johnston Senate Switch.xlsx" (December 11, 2016).**

	Johnston Senate Switch											
	2011 Enacted				New Plan				New Plan Switch			
10	30852	43836	58.69%	29718	38740	56.59%	-2.10%	30495	37897	55.41%	-3.28%	
11	34644	49995	59.07%	38421	47921	55.50%	-3.57%	37654	48764	56.43%	-2.64%	
12	30006	41821	58.22%	30006	41821	58.22%	0.00%	30006	41821	58.22%	0.00%	

Columns H and L of this spreadsheet reflect the Republican vote share for two potential configurations of the draft districts in this cluster using Dr. Hofeller’s partisanship formula, and Column I and M reveal how that vote share compared to the Republican vote share in these districts under the 2011 Plan (reflected in Column E).

Dr. Chen described how other Excel files from the Hofeller files show Dr. Hofeller’s singular focus on maximizing partisan gain at the district-level within county groupings, including groupings in large metropolitan areas such as Wake and Mecklenburg Counties. The following figure from Dr. Chen’s rebuttal report is one example of these files:

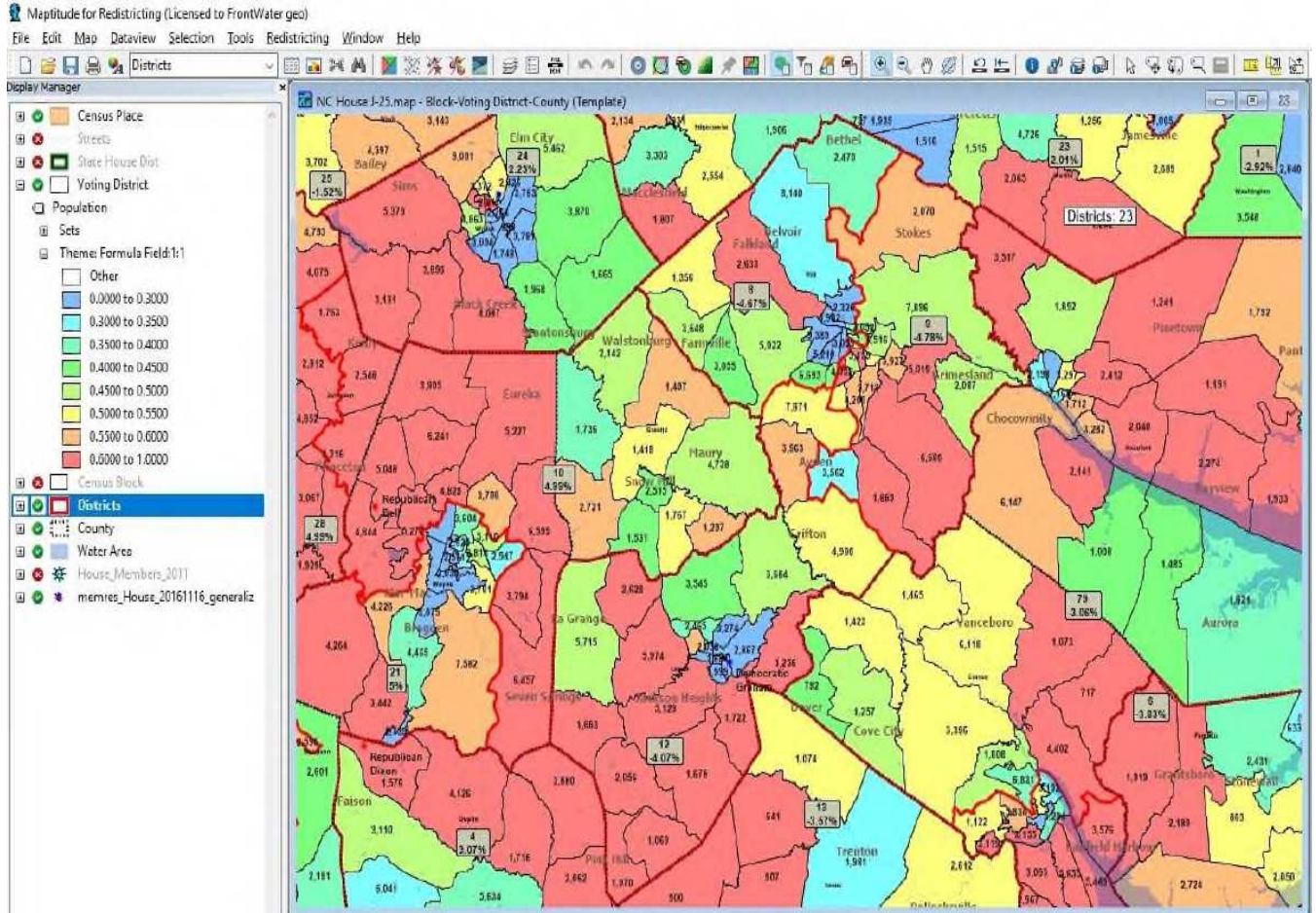
**Chen Figure 39: Dr. Hofeller's Draft Plan File:
"NC Senate Minimum Partisan J-2" (June 13, 2017)**

Group Type	Dist	Avg R	14 Sen%	Incumbent	Pty	Note	Old Ave R	11 ti 17
New	1	47.94%	52.31%	Cook	R		53.54%	-5.60%
Old	2	60.16%	63.13%	Sanderson	R		60.16%	0.00%
New	3	40.10%	43.10%	Smith-Ingram	D		34.18%	5.93%
New	4	37.39%	39.24%	Horner	R	##	31.88%	5.51%
New	5	45.94%	48.68%	Davis	D		36.80%	9.15%
Old	6	59.16%	64.83%	Brown	R		59.16%	0.00%
New	7	50.94%	53.60%	Pate	R		59.37%	-8.43%
Old	8	54.69%	56.14%	Rabon	R		54.69%	0.00%
Old	9	53.05%	51.05%	Lee	R		53.05%	0.00%
New	10	54.75%	57.91%	Jackson	R		57.13%	-2.38%
New	11	54.47%	56.42%	Bryant	D	##	57.61%	-3.13%
New	12	57.19%	58.83%	Rabin	R		57.19%	0.00%
Old	13	41.09%	47.12%	Britt	R	##	41.09%	0.00%
Wake-Franklin	14	25.37%	22.89%	Blue	D		25.54%	-0.17%
Wake-Franklin	15	53.04%	49.97%	Alexander	R		53.32%	-0.28%
Wake-Franklin	16	39.77%	35.22%	Chaudhuri	D		38.80%	0.97%
Wake-Franklin	17	54.36%	51.52%	Barringer	R		53.45%	0.91%
Wake-Franklin	18	52.57%	53.26%	Barefoot	R		52.76%	-0.19%
Cumberland	19	50.79%	53.27%	Meredith	R		49.30%	1.48%
New	20	20.93%	18.06%	McKissick	D		24.15%	-3.23%
Cumberland	21	29.52%	29.98%	Clark	D		30.53%	-1.01%
New	22	40.57%	39.77%	Woodard	D		37.71%	2.86%
Old	23	34.84%	31.50%	Foushee	D		34.84%	0.00%
New	24	56.91%	58.10%	Gunn	R		59.06%	-2.14%
New	25	51.51%	54.18%	McInnis	R		55.19%	-3.68%
New	26	59.18%	62.59%	Berger	R		57.51%	1.67%
New	27	57.95%	56.89%	Wade	R		55.06%	2.90%
New	28	22.97%	22.18%	Robinson	D		18.65%	4.32%
New	29	60.90%	64.77%	Tillman	R		67.04%	-6.14%
New	30	60.87%	63.71%	Randleman, Ballard	R,R	#	66.15%	-5.28%
New	31	64.87%	65.07%	Brock, Krawiec	R,R	#	62.71%	2.16%
New	32	30.42%	29.53%	Lowe	D		31.20%	-0.78%
Old	33	65.39%	68.87%	Dunn	R		65.39%	0.00%
New	34	66.29%	67.96%	Vacant	R	#	63.53%	2.76%
Old	35	65.63%	65.84%	Tucker	R		65.36%	0.27%
Old	36	61.81%	60.28%	Newton	R		62.18%	-0.38%
Mecklenburg	37	31.35%	29.21%	Vacant	D	#	37.87%	-6.52%
Mecklenburg	38	28.06%	23.76%	Jackson	D		23.36%	4.70%
Mecklenburg	39	63.96%	59.63%	Bishop	R		61.93%	2.03%
Mecklenburg	40	29.05%	25.80%	Waddell	D		20.96%	8.09%
Mecklenburg	41	49.59%	45.44%	Ford, Tarte	D,R	###	57.53%	-7.94%
Old	42	65.81%	67.05%	Wells	R		65.81%	0.00%
New	43	62.82%	63.14%	Jarromgtpm	R		62.82%	0.00%

Similarly, Dr. Cooper analyzed certain of Dr. Hofeller’s Maptitude files from the storage devices to demonstrate that, “within a single region,” Dr. Hofeller acted to “maximize partisan advantage.” 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. G at 2. For example, Dr. Cooper analyzed the screenshot below from one of Dr. Hofeller’s Maptitude files for the 2017 Pitt-Lenoir county grouping in the state House. In the image below, the color coding of VTDs using the partisanship formula on the left side of the screen, as well as the draft

district lines and labels, existed in the file when Dr. Hofeller’s last closed this file. Dr. Cooper explained that this file shows how Dr. Hofeller knowingly packed “all of the bluest VTDs” in this cluster “into HD-8,” allowing the other two districts in the cluster (HD-9 and HD-12) to favor Republicans. *Id.* at 16.

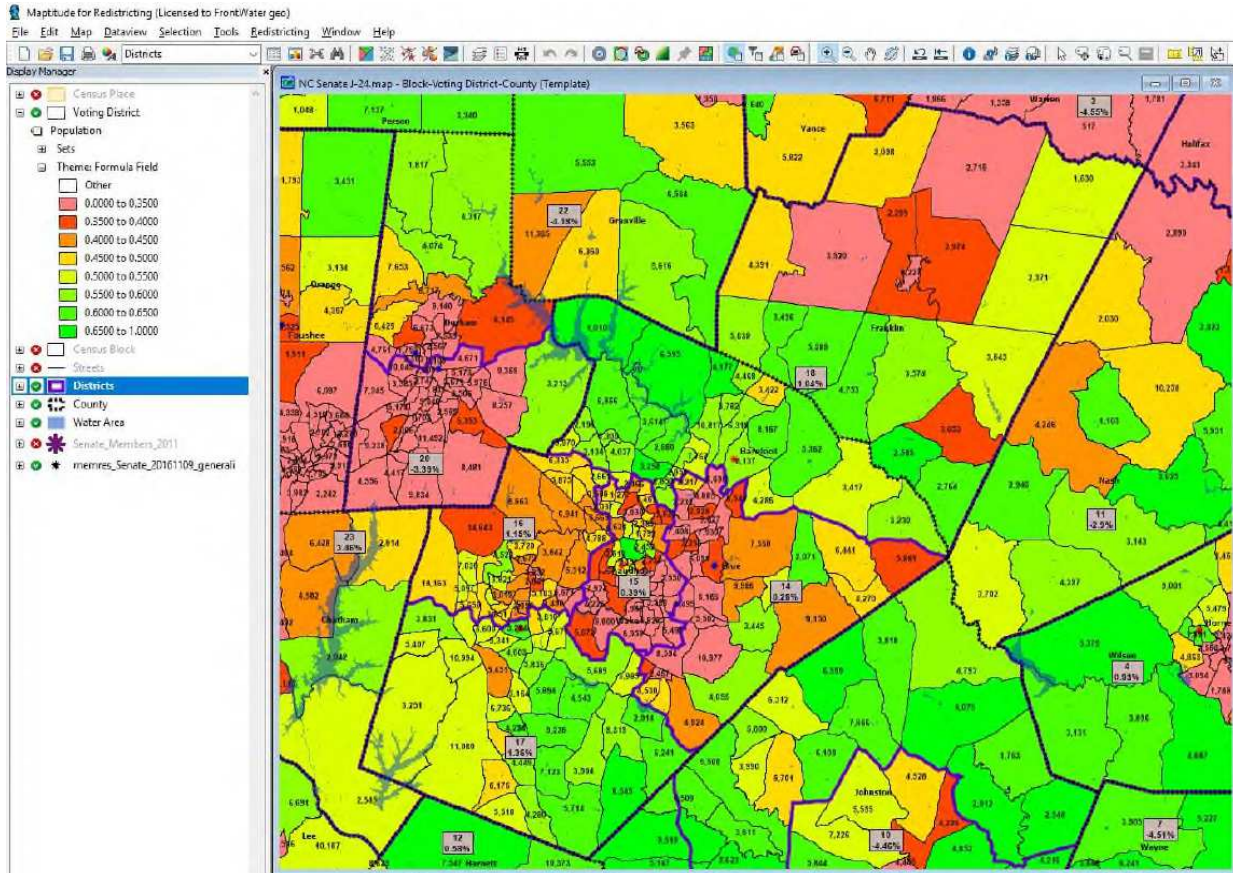
Cooper Figure 11: Partisan Targeting in House Districts 8, 9, and 12



Dr. Cooper presented similar analyses for the other relevant House and Senate county groupings, including those in large metropolitan areas where Legislative Defendants’ experts opined there is purported “natural” packing of Democrats. For instance, Dr. Cooper analyzed the screenshot below from Dr. Hofeller’s Maptitude files for the Wake-Franklin county grouping in the Senate. As Dr. Cooper explained, this screenshot shows that the overwhelmingly Democratic

districts in this grouping do not result from natural clustering, but rather from Dr. Hofeller “drawing the district lines with precision” to pack “all of the most Democratic VTDs [shaded red] . . . into Senate Districts 14, 15, and 16,” thereby allowing “Senate Districts 17 and 18 [to grab] every Republican VTD (shaded green) that is available.” *Id.* at 9.

Figure 4: Partisan Targeting in Senate Districts 14, 15, 16, 17, and 18



The Hofeller files relied upon by Dr. Cooper and Dr. Chen thus directly rebut the opinions offered by Legislative Defendants’ experts that the Whole County Rule constrained Dr. Hofeller’s ability to act with partisan intent, and that purported natural clustering of Democratic voters explains the skew of the districts in certain geographic areas. These Hofeller files also show that, contrary to Dr. Brunell’s claim, “[d]ivining the intent of the map-maker” is not “extraordinarily difficult” in this case. Ex. 11 at 7. The relevant Hofeller files establish

conclusively that Dr. Hofeller created the 2017 Plans with an overriding partisan intent, and Drs. Chen and Cooper properly relied on the files to rebut Legislative Defendants' experts..

B. Dr. Chen Rebutted the Opinions of Legislative Defendants' Experts Regarding Purported Compliance with the Adopted Criteria

Dr. Chen analyzed other Hofeller files to rebut the opinions of two of Legislative Defendants' experts, Dr. Hood and Dr. Thornton, that the "Adopted Criteria" passed by the House and Senate Redistricting Committees on August 10, 2017 constrained Dr. Hofeller in drawing the 2017 Plans, and that the 2017 Plans purportedly comply with the Adopted Criteria.

Below are some of Dr. Hood's and Dr. Thornton's statements offering these opinions:

- Dr. Hood stated as follows:
 - "In addition to the county group rules discussed above, *in 2017, the General Assembly also imposed other criteria on the drawing of legislative districts*. These criteria include population equalization, contiguity, goals for compactness and VTD splits, the consideration of municipal boundaries, and incumbency protection. *Taking into account all the criteria discussed, a map drawer creating district boundary lines within a county group is quite constrained* as to the amount of discretion they may exercise. This is especially the case in county groups containing only a few districts." Ex. 10 at 2-3 (emphases added).
 - "The 2017 House and Senate plans met the goals stated in the adopted redistricting criteria." *Id.* at 9.
- Dr. Thornton stated as follows:
 - "The following summarizes the actual criteria utilized by the legislature in constructing the enacted map." Ex. 12 at 12.
 - "If Dr. Chen had applied the actual criteria utilized by those who constructed the enacted map, he presumably would have generated a different set of maps." *Id.* at 15.
 - "None of the three Plaintiffs' experts apply the same criteria that were used to construct the enacted map." *Id.* at 36.

These opinions were not just passing statements, but central themes of these experts' reports.

The majority of Dr. Hood's report attempts to establish that the Adopted Criteria "constrained" the "map drawer," and that the 2017 Plans comply with the Adopted Criteria. *See* Ex. 10.

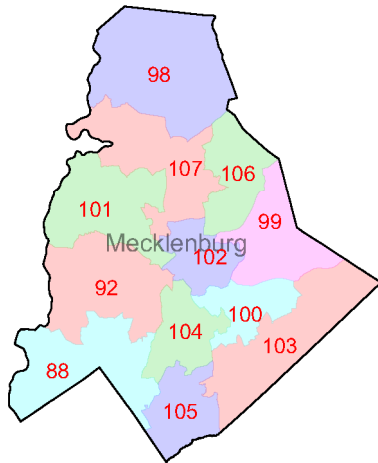
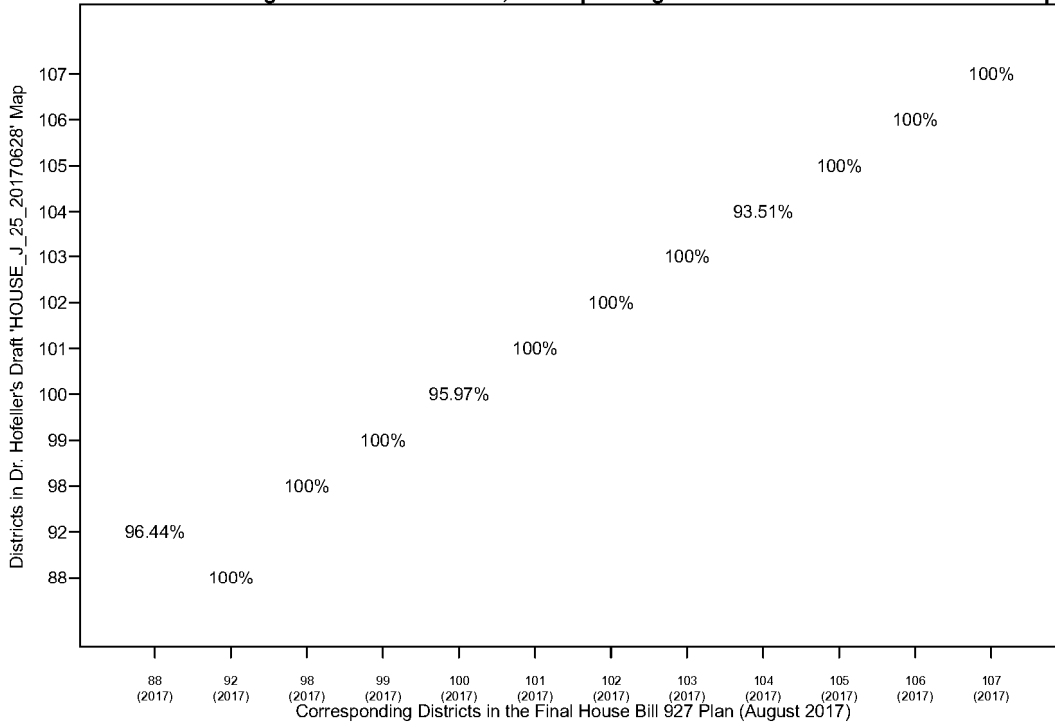
In his rebuttal report, Dr. Chen offered "two responses" "to this claim by Dr. Hood and Dr. Thornton." 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 1. Dr. Chen's first "response is that Dr. Hofeller logically could not have been following the 2017 Adopted Criteria in June 2017, which is when he drafted much of the General Assembly's eventually enacted House and Senate districts." *Id.* The "second response to Dr. Hood's and Dr. Thornton's argument," Dr. Chen wrote, "is that at all times in drawing the 2017 Plans, including after the 2017 Adopted Criteria were passed on August 10, 2017, Dr. Hofeller appeared to violate the Adopted Criteria's prohibition against any 'consideration of racial data.'" *Id.* Dr. Chen then "explain[ed] both of these findings in detail" using the Hofeller files. *Id.*

To establish his "first response," Dr. Chen "examined and analyzed draft maps prepared by Dr. Thomas Hofeller" in June 2017. *Id.* at 2. Dr. Chen "found that many of the new districts that the General Assembly enacted in the 2017 Plans are identical or nearly identical to drafts of those districts that Dr. Hofeller had drawn by June 2017—approximately 1.5 months before the House and Senate Redistricting Committees passed the Adopted Criteria on August 10, 2017." *Id.* Specifically, Dr. Chen found that "in a June 24, 2017 draft Senate map, Dr. Hofeller had already finished assigning [97.6%] of North Carolina's census blocks (containing [95.6%] of the state's population) into their final [Senate] districts,"⁴ and that "in a June 28, 2017 draft House map, Dr. Hofeller had already finished assigning 90.9% of North Carolina's census blocks (containing 88.2% of the state's population) into their final [House] districts." *Id.* at 2.

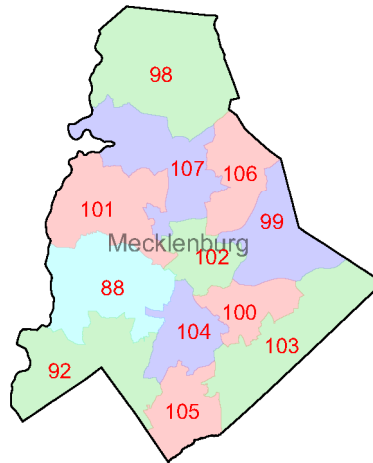
⁴ Dr. Chen's rebuttal report inadvertently flipped the Senate statistics based on Census blocks and population; it listed the overlap percentage based on Census blocks as the percentage based on population, and vice versa.

Legislative Defendants critique Dr. Chen’s analysis, claiming that the “similarity between Dr. Hofeller’s draft maps and the enacted plans” can purportedly be explained by the Whole County Rule. Mot. to Exclude at 26. This dispute can and should be litigated on the merits at trial, but it provides no basis whatsoever to exclude the relevant expert testimony. In any event, even a quick review of Dr. Chen’s analysis demonstrates that Legislative Defendants’ critique does not hold water. Dr. Chen demonstrated that, by June 2017, Dr. Hofeller had already completed drawing districts *within* counties in which the Whole County Rule imposed little to no constraints. For instance, Dr. Chen presented the following figure to show that Dr. Hofeller had already completed or nearly completed all 12 House districts within Mecklenburg County (the map on the left is Dr. Hofeller’s June draft map and the map on the right is the enacted plan):

**Figure 1:
Mecklenburg County Grouping**
(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)



HOUSE_J_25_20170628.shp (Hofeller)



House Bill 927 Plan (12 Districts)

Dr. Chen presented similar analyses for numerous other counties and county groupings where districts were redrawn in 2017 and the Whole County Rule did not constrain Dr. Hofeller's discretion. 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 2-38. Dr. Chen in fact found extraordinarily high overlap in nearly every Senate county

grouping redrawn in 2017. *Id.* at 25-38. As Dr. Chen explained in his rebuttal report, “Dr. Hofeller logically could not have been following the 2017 Adopted Criteria in June 2017” when he drew these districts, since the Adopted Criteria were not passed until a month and a half later. *Id.* at 2. Dr. Chen’s analysis thus directly rebuts the opinions offered by Dr. Hood and Dr. Thornton—particularly Dr. Hood—that the Adopted Criteria “constrained” the “map drawer” in “creating districting boundary lines,” and that the 2017 Plans were drawn to comply with the Adopted Criteria. Ex. 10 at 2-3, 9-10.

Dr. Chen’s analysis of the incorporation of racial data in Dr. Hofeller’s files also rebuts Dr. Hood’s and Dr. Thornton’s conclusions that Dr. Hofeller complied with the Adopted Criteria. One of the Adopted Criteria provided that “[d]ata identifying the race of individuals or voters shall not be used in the drawing of legislative districts in the 2017 House and Senate plans,” and Legislative Defendants clarified that this criterion meant that racial data could not be “loaded into the computer used by the map drawer to construct the districts.” 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 39 (quoting the Adopted Criteria). But, as Dr. Chen explained in his rebuttal report, “analysis of Dr. Hofeller’s Maptitude backup folders reveals that district-level racial calculations were clearly contained within Dr. Hofeller’s draft House and Senate maps, including drafts produced after the August 10, 2017 passage of the Adopted Criteria.” *Id.* As one example, Dr. Chen presented the following screenshots from one of Dr. Hofeller’s draft House maps last modified on August 14, 2017, which showed that Dr. Hofeller sorted the districts from highest to lowest African-American voting age population (BVAP) in his Maptitude “Dataview” window, and that he labeled each district in the same Maptitude file with each district’s BVAP.

Figure 26: Screenshot of Dataview Window for Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017)

Maptitude for Redistricting (Licensed to FrontWater geo)

File Edit Dataview Selection Tools Redistricting Window Help

All Records

Dataview1 - Districts in Plan (120); Maximum (120)

District	Population	Deviation	Members	[% Deviation]	[% NH18+_Wh]	[% 18+_AP_Blk]	[% H18+_Pop]	[% 18+_Ind]
107	0	-79,462	1.0	-100%	17.25%	68.95%	9.02%	0.53%
27	2	-79,460	1.0	-100%	41.54%	53.71%	1.53%	2.71%
23	0	-79,462	1.0	-100%	44.85%	51.83%	2.78%	0.3%
31	2	-79,460	1.0	-100%	32.17%	50.87%	12.72%	0.55%
32	3	-79,459	1.0	-100%	44.97%	49.12%	4.13%	1.44%
43	2	-79,460	1.0	-100%	36.19%	48.97%	10.4%	0.87%
72	3	-79,459	1.0	-100%	38.97%	46.63%	12.79%	0.47%
42	0	-79,462	1.0	-100%	41.35%	46.6%	8.68%	1.01%
58	2	-79,460	1.0	-100%	43.49%	46.22%	6.47%	0.48%
99	0	-79,462	1.0	-100%	32.34%	46.19%	17.55%	0.56%
8	2	-79,460	1.0	-100%	48.2%	44.91%	4.65%	0.33%
57	1	-79,461	1.0	-100%	49.11%	44.5%	3.85%	0.46%
5	0	-79,462	1.0	-100%	51.26%	44.32%	2.75%	0.64%
39	0	-79,462	1.0	-100%	40.85%	44.2%	13.17%	0.62%
59	2	-79,460	1.0	-100%	40.64%	42.33%	10.59%	0.73%
38	3	-79,459	1.0	-100%	37.61%	42.25%	15.37%	0.59%
101	3	-79,459	1.0	-100%	46.35%	42.02%	7.78%	0.52%
21	3	-79,459	1.0	-100%	46.53%	41.9%	9.68%	0.64%
71	2	-79,460	1.0	-100%	44.82%	40.56%	13.2%	0.41%
1	1	-79,461	1.0	-100%	57.23%	39.71%	1.93%	0.32%
33	2	-79,460	1.0	-100%	45.7%	39.34%	9.77%	0.51%
92	1	-79,461	1.0	-100%	41.32%	38.67%	15.3%	0.55%
102	2	-79,460	1.0	-100%	43.38%	38.43%	14.32%	0.52%
24	3	-79,459	1.0	-100%	53.16%	38.11%	7.6%	0.28%
60	1	-79,461	1.0	-100%	49.41%	37.05%	7.46%	0.62%
12	1	-79,461	1.0	-100%	57.25%	36.6%	5.2%	0.41%
48	1	-79,461	1.0	-100%	46.39%	36.13%	6.42%	9.48%
7	1	-79,461	1.0	-100%	57.9%	35.83%	5.14%	0.61%
106	1	-79,461	1.0	-100%	48.31%	34.97%	7.37%	0.37%
29	1	-79,461	1.0	-100%	46.96%	32.71%	12.6%	0.47%
30	4	-79,458	1.0	-99.99%	54.09%	32.35%	10.2%	0.39%
100	1	-79,461	1.0	-100%	47.76%	32.17%	16.18%	0.61%
25	2	-79,460	1.0	-100%	62.61%	30.25%	5.64%	0.62%
88	2	-79,460	1.0	-100%	46.13%	29.82%	17.86%	0.48%
18	0	-79,462	1.0	-100%	63.5%	29.24%	5.35%	0.75%
22	0	-79,462	1.0	-100%	59.22%	28.56%	9.7%	2.1%
2	0	-79,462	1.0	-100%	65.76%	27.79%	5.28%	0.67%
45	2	-79,460	1.0	-100%	63.53%	26.76%	5.02%	2.95%
46	3	-79,459	1.0	-100%	56.41%	26.51%	5.79%	10.05%
44	3	-79,459	1.0	-100%	60.72%	25.99%	7.98%	1.72%
79	2	-79,460	1.0	-100%	68.1%	25.67%	5.02%	0.45%
47	0	-79,462	1.0	-100%	16.27%	25.13%	6.18%	51.56%
66	0	-79,462	1.0	-100%	66.72%	24.24%	6.12%	1.46%
55	3	-79,459	1.0	-100%	70.64%	24.12%	3.9%	0.46%
4	2	-79,460	1.0	-100%	62.97%	22.59%	13.39%	0.49%
16	1	-79,461	1.0	-100%	70.46%	22.04%	4.69%	2.01%

districts being developed.” *Id.* at 47-48. Dr. Chen’s opinions based on these Hofeller files specifically rebut opinions offered by Legislative Defendants’ experts.

C. Legislative Defendants Cannot Claim Any Unfair Prejudice

Dr. Chen’s and Dr. Cooper’s analyses of the Hofeller files are independently admissible, regardless of whether the rebuttal reports exceed the scope of Legislative Defendants’ expert reports, because Legislative Defendants cannot claim any “unfair surprise” or prejudice.

Jackson, 810 S.E.2d at 402-03.

First, Legislative Defendants are accountable for the delay in the parties obtaining the relevant Hofeller files, because all of those files are public records that should have been made public to the people of North Carolina long ago. Consistent with N.C. Gen. Stat. § 120-133(a), Dr. Hofeller’s contract with Legislative Defendants to draw the 2017 Plans provided that “all drafting and information requests to [Dr. Hofeller] and documents prepared by [Dr. Hofeller] concerning redistricting shall no longer be confidential and *shall become public records* upon the act establishing the relevant district plan becoming law.” Ex. 15 at 1 (emphasis added). This provision contains no time limitation or exceptions—it provides that “all . . . documents prepared by Dr. Hofeller concerning” the 2017 Plans “shall become public records” upon the passage of the 2017 Plans. *Id.* Consequently, as soon as the General Assembly enacted the 2017 Plans in August 2017, all of Dr. Hofeller’s work product in creating the 2017 Plans became public records. This encompasses all of Dr. Hofeller’s drafts of the 2017 Plans and analyses of those drafts that Dr. Chen and Dr. Cooper relied upon in their expert reports.

Thus, all of the Hofeller files at issue should have been made public back in the Fall of 2017, while Dr. Hofeller was serving as Legislative Defendants’ agent. It does not matter whether, as Legislative Defendants claim, they did not know that Dr. Hofeller created and possessed these files or that these files were not loaded onto the legislative computer. It is

blackletter law that “[a] principal is chargeable with and bound by the knowledge of or notice to his agent.” *Great Am. Ins. Co. v. C.G. Tate Const. Co.*, 315 N.C. 714, 723, 340 S.E.2d 743, 749 (1986) (internal quotations marks omitted); *accord Morpul Research Corp. v. Westover Hardware, Inc.*, 263 N.C. 718, 721, 140 S.E.2d 416, 418 (1965). Legislative Defendants are accountable for the failure to make these files public in the Fall of 2017, after the 2017 Plans were enacted. They cannot now claim unfair prejudice from the fact that it took a year-and-a-half for these public records to see the light of day.

Second, Legislative Defendants also cannot claim unfair prejudice because they were responsible for the timeline under which they received copies of the files after Ms. Hofeller produced them. Legislative Defendants first requested copies of the storage devices on March 26, 2017. The next day, Plaintiffs told all Defendants that, based on file and folder names, it was apparent that the devices included medical, tax, and other sensitive personal information. Ex. 16 at 11-12 (3/27/19 email from E. Theodore). Plaintiffs offered to have their vendor use keyword searches to “pull out these personal files *and then make a copy of everything that remains, and provide you with that copy.*” *Id.* at 11 (emphasis added). After waiting five days to respond, Legislative Defendants rejected this offer. *Id.* at 8-9 (4/1/19 email from P. Strach).

Needless to say, Plaintiffs’ experts have not relied on any of the sensitive personal files that Plaintiffs refrained from sharing with Legislative Defendants pending this Court’s resolution of Plaintiffs’ motion for clarification. Legislative Defendants could have had access to every single file that Plaintiffs’ experts relied on by late March, but they declined.

And they declined repeated offers to get copies of these files in April. On April 11, while Plaintiffs’ motion for clarification was pending, Plaintiffs sent Legislative Defendants a list of the specific 1,001 files that Plaintiffs proposed to filter out, along with the keywords used to

generate that list, and asked whether Legislative Defendants would consent to filtering just these specific files given that all of them were obviously sensitive and personal in light of their file names. Ex. 17 at 1-2, 4 (4/11/19 and 4/12/19 emails from S. Jones). Legislative Defendants declined this offer. Then, on April 18, Plaintiffs emailed Legislative Defendants “to again give [them] the opportunity to receive the materials that we do not propose to filter.” *Id.* at 1 (4/18/19 email from S. Jones). Plaintiffs indicated that they would immediately send Legislative Defendants copies of all of the files other than the 1,001 personal files, and Plaintiffs would even absorb the costs of doing so if the Court later declined to allow for filtering. *Id.* Legislative Defendants never responded to that offer.

In these circumstances, Legislative Defendants cannot claim unfair prejudice based on the date on which they received the Hofeller files. At any time on or after March 27, Legislative Defendants could have agreed to accept copies of all of the files except for the small number of sensitive personal files that were in dispute, while still litigating access to those small number of files. But Legislative Defendants chose not to do so.

Third, Legislative Defendants are wrong to suggest that Plaintiffs engaged in “sandbagging.” Mot. to Exclude at 15, 17. For the reasons already explained, Dr. Chen’s and Dr. Cooper’s rebuttal reports were directly responsive to Legislative Defendants’ experts’ opinions. And Plaintiffs did not and would not intentionally withhold materials from their opening expert reports in the hopes that Legislative Defendants’ experts may offer opinions for which the Hofeller files would be responsive. Plaintiffs received the FedEx package containing the devices on March 13, just nine days before their experts’ opening reports were originally due. Indeed, there are additional North Carolina-related documents in the Hofeller files that Plaintiffs’

experts may have included in their opening reports but did not include in their rebuttal reports because those files were not responsive to Legislative Defendants' experts.

Finally, any possible prejudice to Legislative Defendants has been cured. As of this filing, they have had the Hofeller files for nearly two months, and their motion *in limine* includes a 12-page "Expert Rebuttal Report" from their expert Dr. Johnson attempting to counter Dr. Chen's analysis of the Hofeller files. Plaintiffs disagree with Dr. Johnson's analysis in his Rebuttal Report, and ordinarily would object to the addition of new expert analysis after the expert's deposition. In fact, just four days before he submitted his 12-page Rebuttal Report, Dr. Johnson was asked at his deposition whether he had been "asked to do any analysis . . . responsive to what is in plaintiffs' rebuttal expert reports, and Dr. Johnson answered: "No, I haven't had a chance to look at them in enough detail yet." Ex. 18 at 44:22-45:1.

Notwithstanding this testimony, to eliminate any possible claim of prejudice, Plaintiffs will consent to Dr. Johnson testifying about the analysis in his June 21 "Rebuttal Report" if Dr. Chen and Cooper are permitted to testify about their analysis of the relevant Hofeller files. (Plaintiffs do not consent to any new or revised analysis of the Hofeller files, or any other analysis on any undisclosed subject, from Legislative Defendants' experts.) Legislative Defendants cannot claim any prejudice where their expert is permitted to offer opinions on the Hofeller files based on an analysis that he prepared nearly two months after Legislative Defendants came into possession of the files.

Legislative Defendants could not claim unfair prejudice even without Dr. Johnson's rebuttal report. Any prejudice in relation to the timing of an expert's analysis is mitigated where "the defense was afforded the opportunity to fully examine" the expert about the relevant analysis before trial, *State v. Jackson*, 810 S.E.2d 397, 404 (N.C. Ct. App. 2018), in particular

through a deposition. See *Leaks v. Target Corp.*, 2015 WL 4092450, at *4 (S.D. Ga. July 6, 2015) (no prejudice where defendant “received notice that [the rebuttal expert would be called and took his deposition on the penultimate day of discovery”). Here, Legislative Defendants deposed Dr. Chen and Dr. Cooper at length about their analyses of the Hofeller files.

III. Dr. Chen’s and Dr. Cooper’s Expert Analyses Are Reliable

Legislative Defendants next argue that Dr. Chen’s and Dr. Cooper’s analyses of the relevant Hofeller files do not meet the reliability standards for expert testimony under North Carolina Rule of Evidence 702. The test for reliability under Rule 702 is not “rigid”; “the factors articulated in *Daubert* are part of a flexible inquiry” and “do not form a definitive checklist or test.” *State v. Barker*, 809 S.E.2d 171, 175 (N.C. Ct. App. 2017) (internal quotation marks omitted). Rule 702 does not “require the expert’s testimony to be proven conclusively reliable or indisputably valid before it can be admitted into evidence,” *State v. Howard*, 803 S.E.2d 870 (N.C. Ct. App. 2017), nor does the Rule “mandate that the witness always have a particular degree or certification, or practice a particular profession,” *State v. McGrady*, 368 N.C. 880, 889-90, 787 S.E.2d 1, 9 (2016). At bottom, the question is “[d]oes the witness have enough expertise to be in a better position than the trier of fact to have an opinion on the subject?” *Id.* Dr. Chen and Dr. Cooper easily satisfy that threshold with respect to their analyses of the Hofeller files.

1. Legislative Defendants argue that Dr. Chen and Dr. Cooper “lack the requisite specialization” in Maptitude, the software application Dr. Hofeller used to draw maps. Mot. to Exclude at 19. Legislative Defendants describe Dr. Chen and Dr. Cooper, along with Plaintiffs’ consulting expert Blake Esselstyn who assisted these two experts, as “several people with generic computer skills bumbling through a program they barely knew.” *Id.* at 17. This characterization does not withstand even minimal scrutiny.

Dr. Chen, who programs his own computer algorithms to generate computer-simulated districting plans, is an expert in redistricting and “geographic information systems,” or “GIS.” Dr. Chen has worked extensively with a number of different GIS software programs, all of which have shared features and ways of incorporating redistricting-related data. Maptitude is one of the GIS software programs with which Dr. Chen has experience. While Dr. Chen testified at deposition that he does not currently own a Maptitude license, he testified that he has had “Maptitude on [his] computer before” and that he has used it to analyze redistricting plans. Ex. 19 at 321:16-25. Dr. Chen then testified at length about the Maptitude features relevant to his analysis here, answering every Maptitude-related question posed to him in detail. *See id.* at 330:4-357:3. He explained, for example, how a user operates Maptitude’s formula fields such as those that Dr. Hofeller had for partisan and racial data (*id.* at 330:12-20), that Maptitude allows a mapmaker “to dynamically see updates of partisan data [or] racial data” as the mapmaker is drawing districts (*id.* at 333:2-10), and “the way a Maptitude backup works.” (*id.* at 335:23-25).

Moreover, most of Dr. Chen’s analysis of the relevant Hofeller files does not require any detailed knowledge of Maptitude. To compare Dr. Hofeller’s June 2017 draft House and Senate plans to the enacted 2017 Plans, Dr. Chen directed Plaintiffs’ consulting expert Blake Esselstyn to export a “shapefile” of the draft plans out of Maptitude. 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 2 n.*; Ex. 19 at 366:8-11. A “shapefile,” which contains data on the geographic boundaries of each draft district, is not specific to Maptitude. Dr. Chen works with shapefiles in virtually all of his redistricting work, and to analyze the overlap between Dr. Hofeller’s June 2017 draft plans and the enacted plans, Dr. Chen “wrote [his] own code” using a programming language called “R.” Ex. 19 at 364:8-14. This analysis required no detailed knowledge of Maptitude. Likewise, Dr. Chen obviously

needed no Maptitude knowledge to analyze the Microsoft Excel spreadsheets presented on pages 43-75 of his rebuttal reports. 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 43-75. The only analysis by Dr. Chen that involved Maptitude was his analysis of the racial data loaded into Dr. Hofeller's Maptitude files, and most of this requires merely viewing how the data are sorted and presented. *Id.* at 41-45.

As for Dr. Cooper, he relied on Plaintiffs' consulting expert Blake Esselstyn to process and open the Maptitude files. Legislative Defendants seek to disparage Mr. Esselstyn's Maptitude knowledge, *see* Mot. to Exclude at 21, but Mr. Esselstyn has enormous Maptitude and GIS experience. He has worked professionally with GIS systems for the last 25 years, has had a Maptitude license for years, and specifically lists Maptitude on his Curriculum Vitae as one of the GIS programs in which he specializes. Ex. 20 at 5. Mr. Esselstyn has even taught graduate students at Yale on the use of Maptitude. *Id.* at 3.

Dr. Cooper relied upon Mr. Esselstyn to process and open the Maptitude files, but once Mr. Esselstyn opened those files (with Dr. Cooper watching in real time), Dr. Cooper did not need any specialized Maptitude knowledge to perform his analysis. All Dr. Cooper needed to know is that Maptitude files save the display screens within the files exactly as they existed when the user last saved and closed the file, which is undisputed. From there, Dr. Cooper used his expert knowledge in redistricting and North Carolina's political geography to evaluate how the files reveal Dr. Hofeller's use of partisanship in constructing the districts. *See* 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. G at 2-35.

2. Legislative Defendants contend that Dr. Chen's and Dr. Cooper's analyses are "not based on sufficient facts or data" because the files they reviewed were purportedly "curated for them (i.e., cherry-picked) by Plaintiffs' counsel." Mot. to Exclude at 21-22. Legislative

Defendants repeat this assertion several times, stating that “Dr. Chen and Dr. Cooper relied entirely on Plaintiffs’ counsel to provide them” with files, and that “Plaintiffs’ counsel, not the experts, chose which maps would be reviewed.” *Id.* at 22. This would not be a basis to exclude the experts’ testimony even if true, but it is in fact demonstrably false.

Plaintiffs’ counsel did not “curate” or “choose” the Maptitude files that Dr. Cooper analyzed in his rebuttal report. Dr. Cooper selected and analyzed the files presented in his report in consultation with Mr. Esselstyn, Plaintiffs’ consulting expert. Legislative Defendants cite no evidence for their incorrect statements to the contrary, and there is none.

With respect to Dr. Chen, Legislative Defendants asked him at his deposition, “Who decided what information you received? Was that your decision or was it someone else’s decision?” Ex. 19 at 323:8-10. Dr. Chen answered: “sometimes it’s the former and sometimes it’s the latter.” *Id.* at 323:11-20. Dr. Chen then detailed that he—not counsel—selected for review the six Maptitude files described on pages 40-46 of his rebuttal report. *Id.* at 325:13-329:6. Dr. Chen also explained that the Excel files he analyzed were in “two folders called NC 2017 Redistricting and 2017 Redistricting” that Plaintiffs’ counsel had Stroz Friedberg send to him. *Id.* at 347:24-348:25. Plaintiffs’ counsel did not “curate” these files for Dr. Chen. Counsel had Stroz Friedberg send Dr. Chen two complete folders from Dr. Hofeller’s files that plainly concerned the 2017 Plans, and Dr. Chen analyzed all the files inside. 6/21/19 Mot. *in Limine* to Admit Certain Files of Dr. Thomas B. Hofeller, Ex. F at 76. The only two remaining files are the June 2017 draft maps for which Dr. Chen evaluated their overlap with the final enacted plans. Plaintiffs’ counsel had these files sent to Dr. Chen, but without any idea what they would show.

Again, it would be irrelevant to the question of admissibility whether Plaintiffs' counsel selected the files for their experts to review. But Legislative Defendants' claim that Plaintiffs' counsel "cherry-picked" the files that Dr. Chen and Dr. Cooper analyzed is simply not true.

3. Legislative Defendants' argument that Dr. Chen's and Dr. Cooper's analyses are "not based on reliable methodology" can be rejected without difficulty. Mot. to Exclude at 23-24. They presented thorough analyses of the files based on their distinct areas of expertise.

4. Legislative Defendants' final argument, that "the reports are a mismatch for the facts of the case," is clearly without merit. Mot. to Exclude at 24. Legislative Defendants contend that "[a]n analysis of Dr. Hofeller's computer is not linked to the relevant case issues because Dr. Hofeller had no ability to pass a map." *Id.* While Dr. Hofeller had no ability to "pass" the map, he did have the ability to draw maps, and Legislative Defendants hired him to do just that. His actions and intent in drawing the 2017 Plans are of central relevance to this case.

IV. The Relevant Hofeller Files Are Admissible Even Apart From the Expert Testimony

Once Plaintiffs authenticate the relevant Hofeller files through the testimony of Ms. Hofeller and Mr. Matthews and related evidence, those files will be admissible for the reasons explained in Plaintiffs own motion *in limine* to admit the files, regardless of expert testimony about the files. Although the Court would benefit from expert analysis of the files and such analysis is admissible, the content of the relevant Hofeller files—such as the Excel spreadsheets that show partisan scoring for the districts, or the Maptitude screenshots that show color-coding for the partisanship of VTDs—is also admissible simply as fact evidence. *See, e.g., Peach v. McGovern*, 2019 IL 123156, ¶¶ 40-43 (Ill. 2019) (admitting "postaccident photographs . . . without requiring expert testimony").

V. The Court Should Reject Legislative Defendants' Request to Delay the Trial

This Court should reject Legislative Defendants' alternative request to "continue the trial and allow another 45 days for expert discovery." Mot. to Exclude at 28. Legislative Defendants' complaints regarding the timing of when they received the Hofeller files are without merit for the reasons already explained. Indeed, it would be particularly perverse for Legislative Defendants to obtain the benefit of delay when they are responsible for failing to ensure that these public records were gathered and made public back in 2017. Moreover, Legislative Defendants have already prepared and submitted the "Rebuttal Report" of their expert Dr. Johnson analyzing the relevant Hofeller files, which Legislative Defendants discuss at length in their motion. *See id.* at 26-28. As mentioned, Plaintiffs will not object to Dr. Johnson testifying about the contents of his Rebuttal Report.

Legislative Defendants' request is just the latest in their series of efforts to delay and derail this case. Just weeks after Plaintiffs filed this case, Legislative Defendants passed a bill that purported to significantly extend the time that General Assembly must be afforded to developing remedial districting plans if the current plans are struck down. *See* HB 1029 § 4.7.⁵ Then, on December 14, 2018, Legislative Defendants baselessly removed this exclusively state-law challenge to federal court. After the federal district court remanded the case several weeks later, Legislative Defendants filed a frivolous motion asking the district court to delay sending the certified remand order back to this Court. *See Common Cause v. Lewis*, No. 18-cv-589, ECF Nos. 46, 53 (E.D.N.C.). Thereafter, Legislative Defendants requested a trial date that would have made it impossible to implement remedial plans in time for the next election.

⁵ This amendment cannot be lawfully applied to this case that was already-filed when the bill was passed, and the provision is unconstitutional in any event if it would prevent the implementation of remedial plans.

Legislative Defendants' new request is just their latest effort to run out the clock. This Court should deny the request, deny Legislative Defendants' motion to exclude, and hold that the relevant Hofeller files are admissible.

CONCLUSION

For the reasons stated above, Plaintiffs request that the Court deny Legislative Defendants' motion to exclude the Hofeller files at trial.

Respectfully submitted this the 1st 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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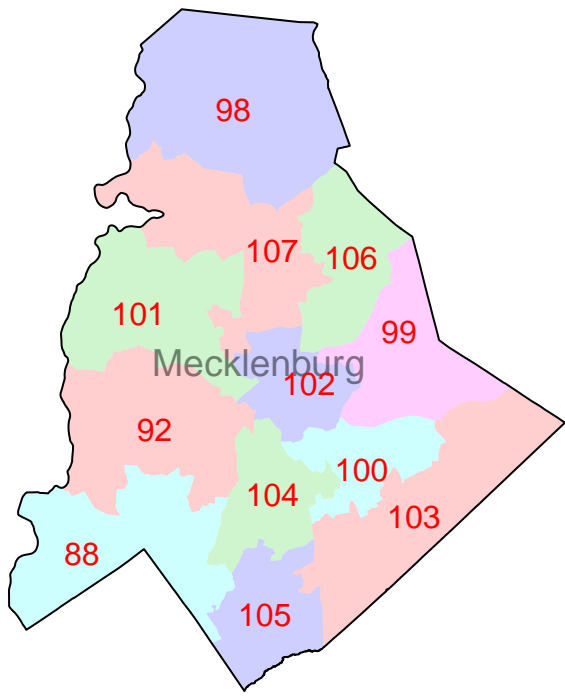
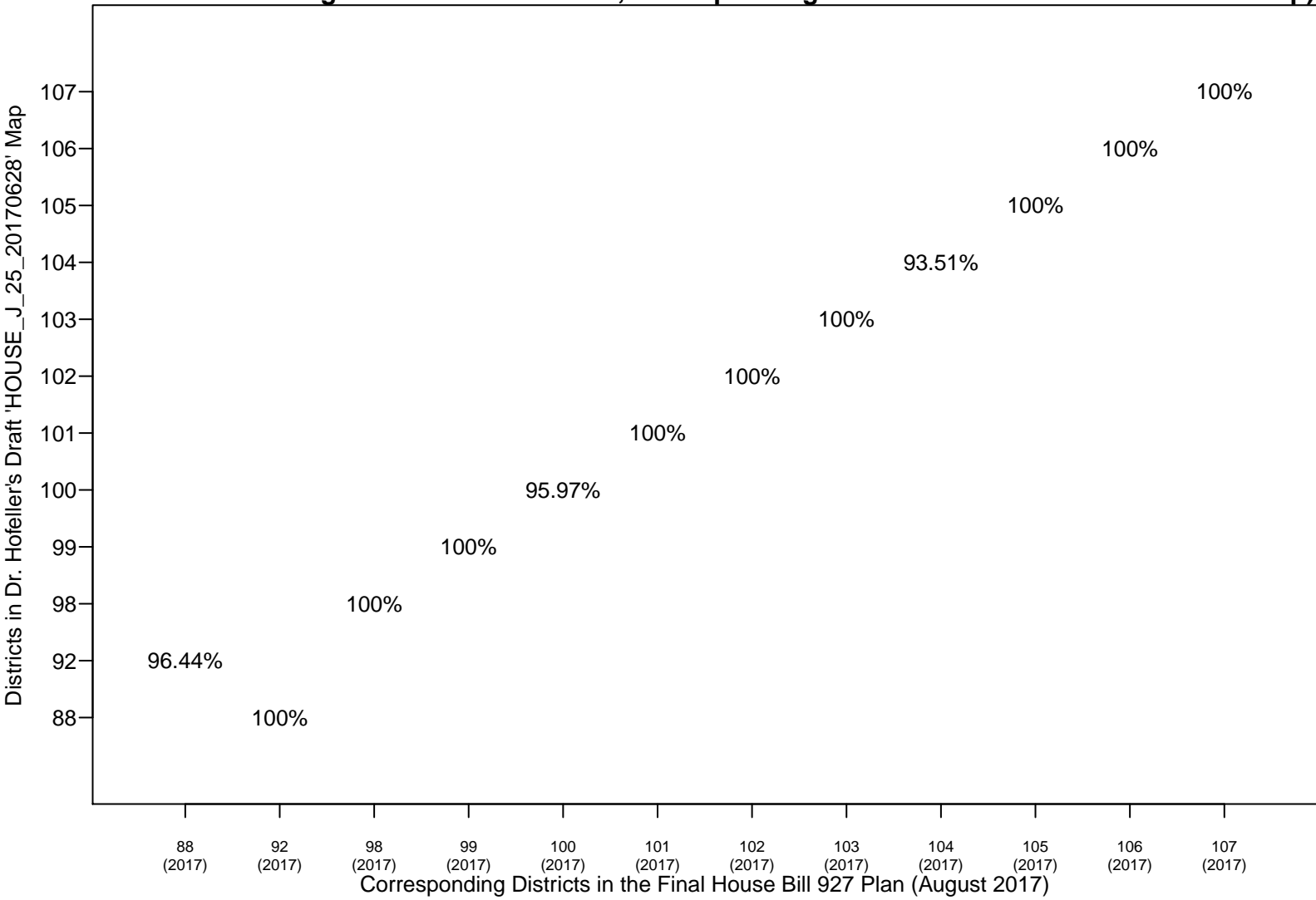
Edwin M. Speas, Jr.

EXHIBIT 1

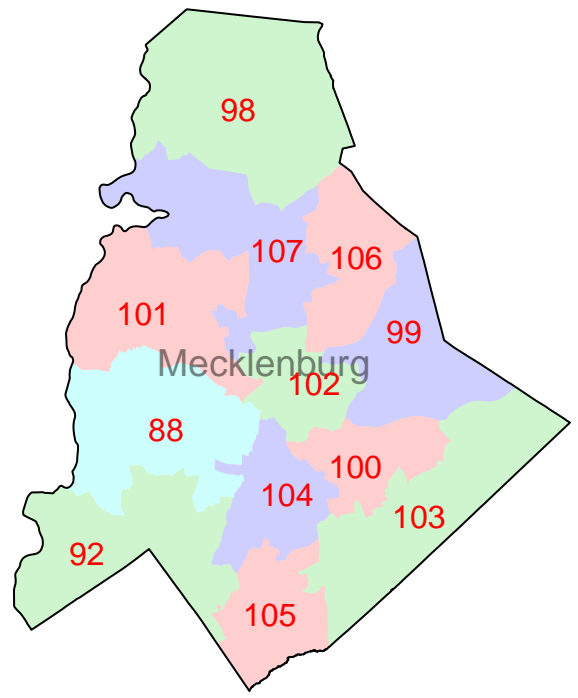
Figure 1:

Mecklenburg County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)



HOUSE_J_25_20170628.shp (Hofeller)



House Bill 927 Plan (12 Districts)

Figure 2:
Alexander–Alleghany–Rockingham–Stokes–Surry–Wilkes County Grouping
 (Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map

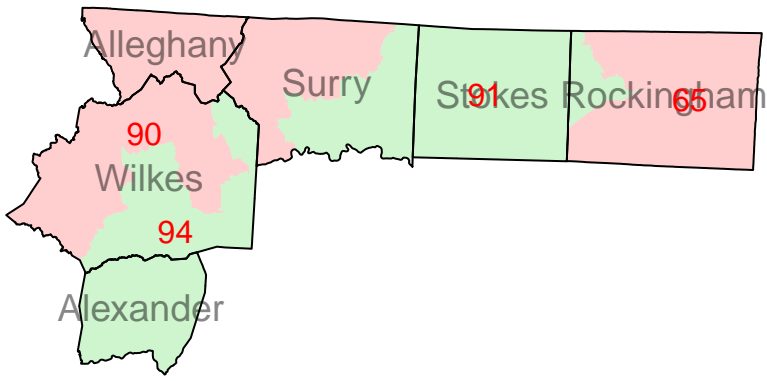
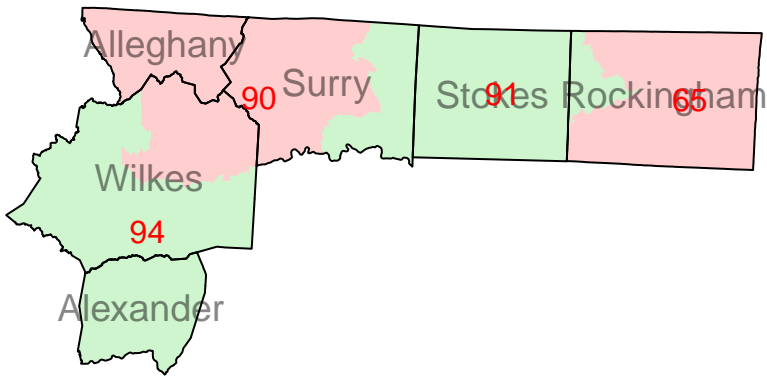
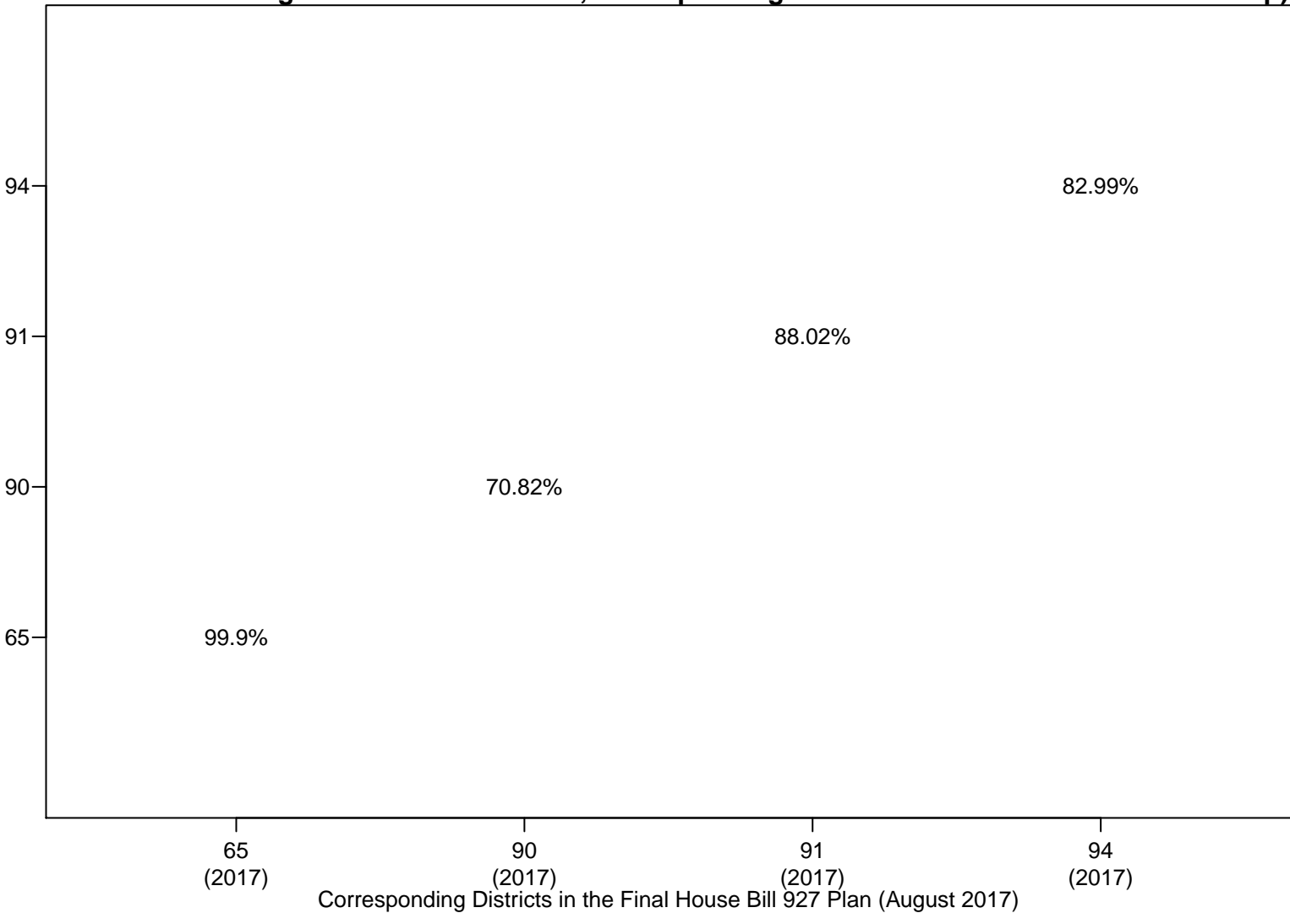
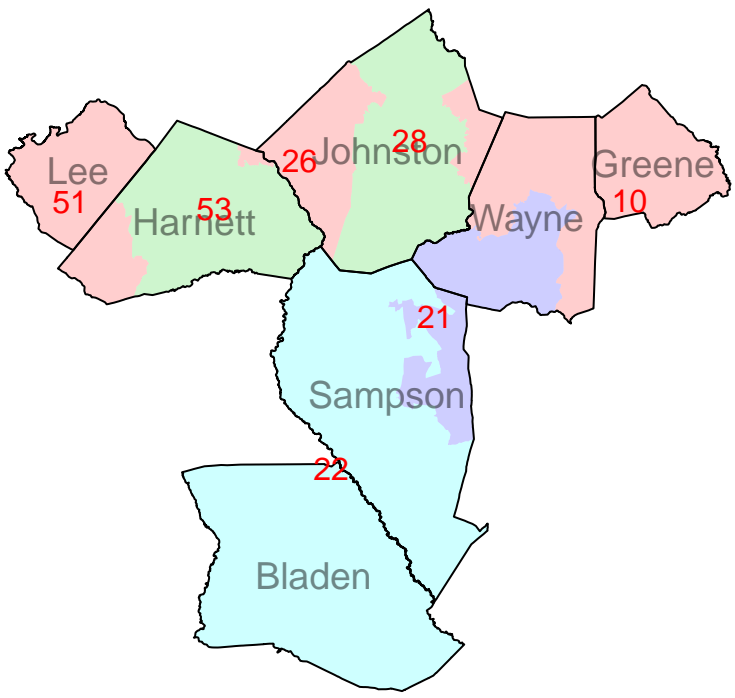
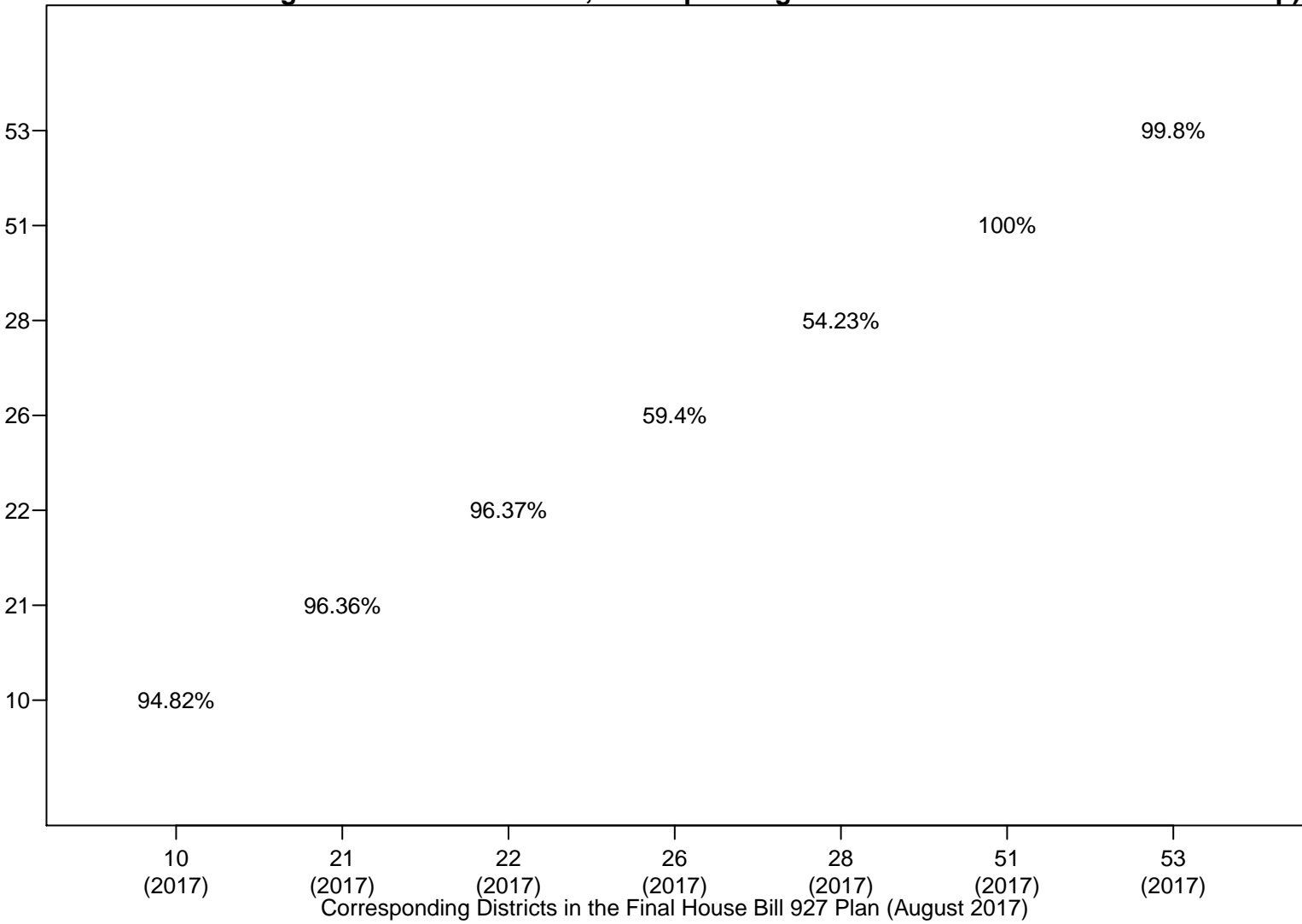


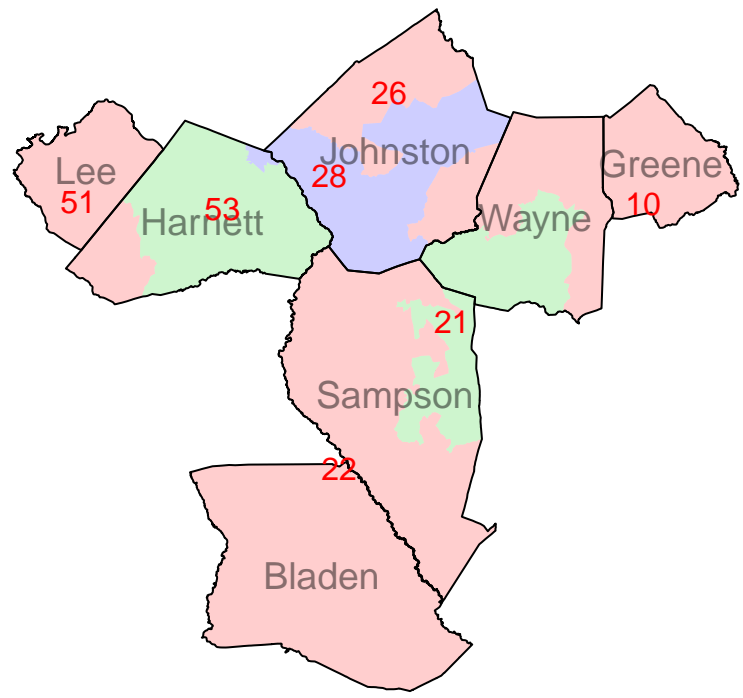
Figure 3:

Bladen–Greene–Harnett–Johnston–Lee–Sampson–Wayne County Grouping
 (Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



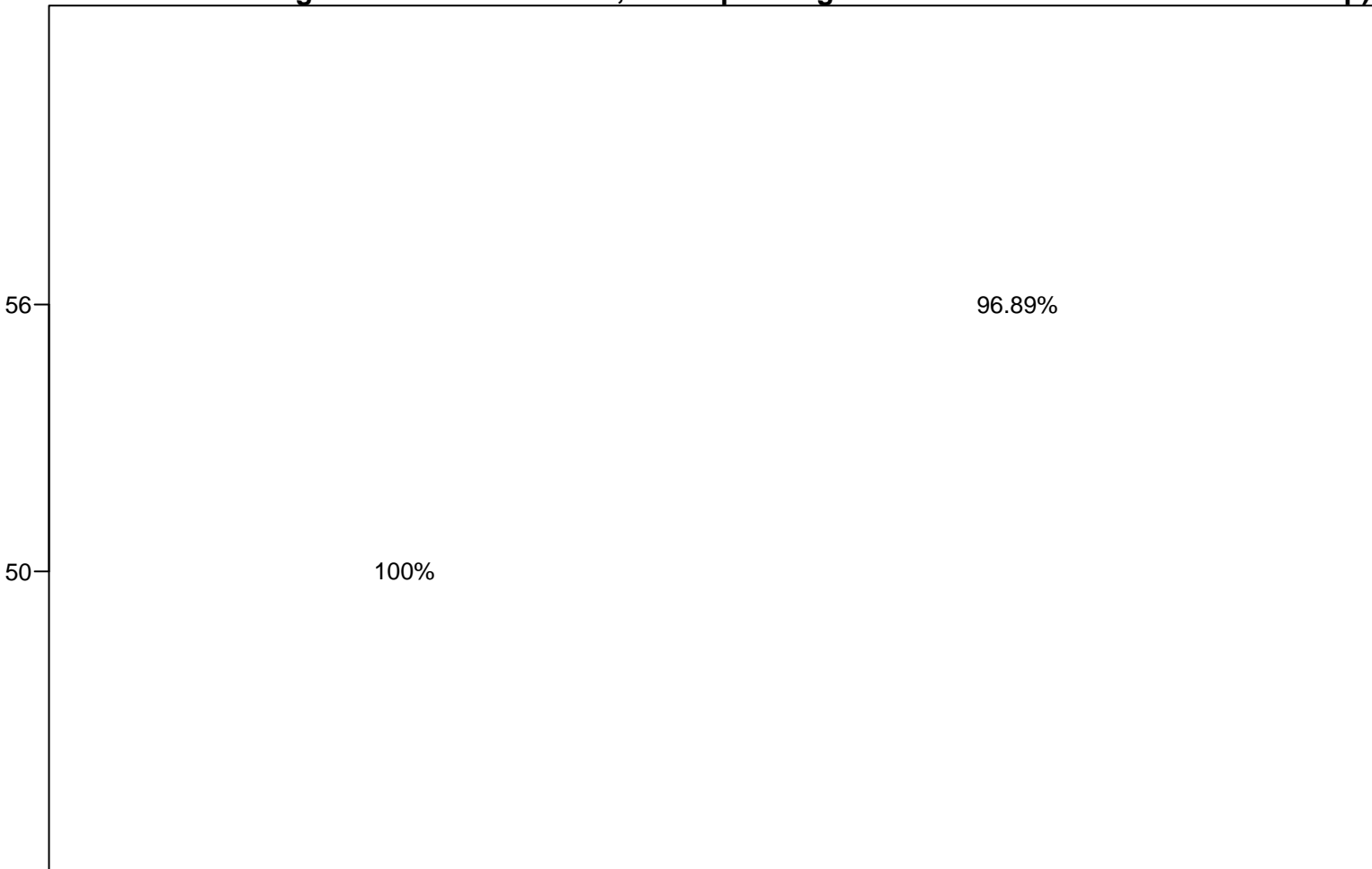
House Bill 927 Plan (7 Districts)

Figure 4:

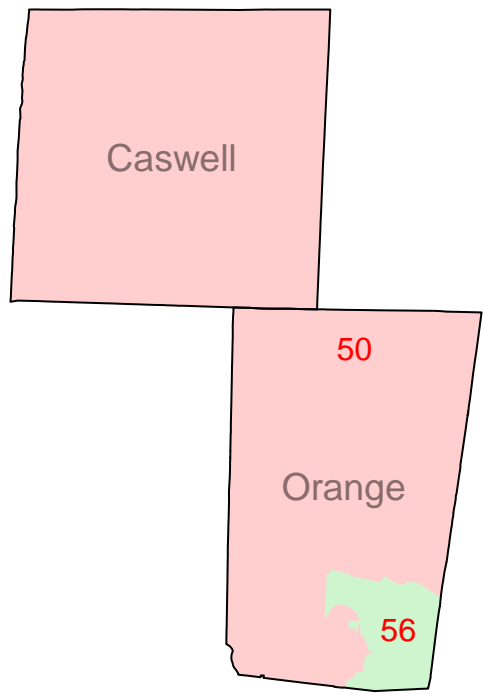
Caswell–Orange County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

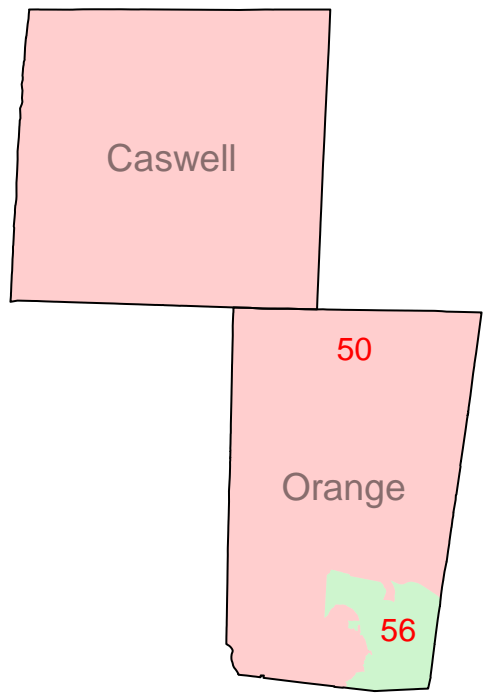
Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



50 (2017) 56 (2017)
Corresponding Districts in the Final House Bill 927 Plan (August 2017)



HOUSE_J_25_20170628.shp (Hofeller)



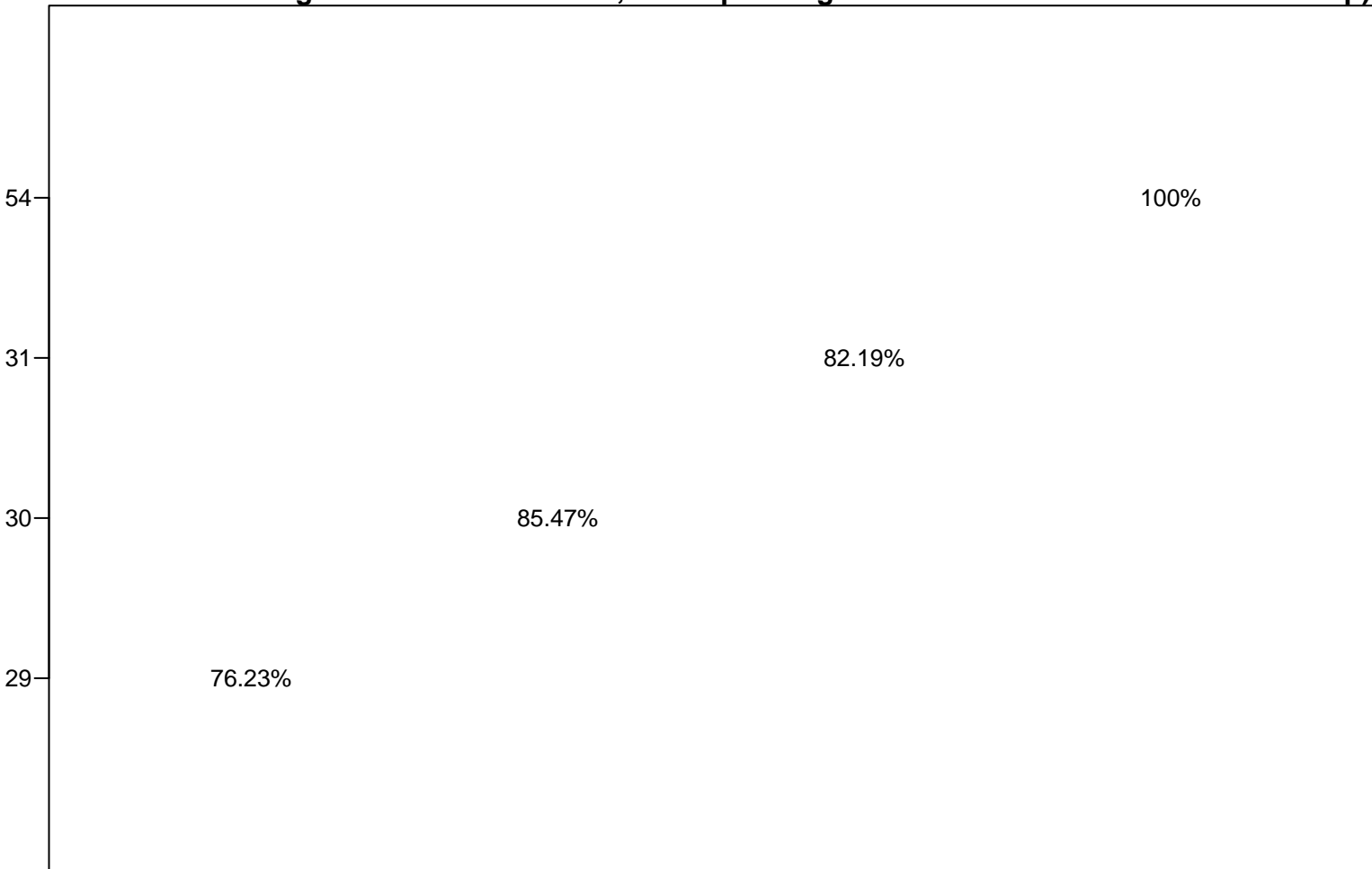
House Bill 927 Plan (2 Districts)

Figure 5:

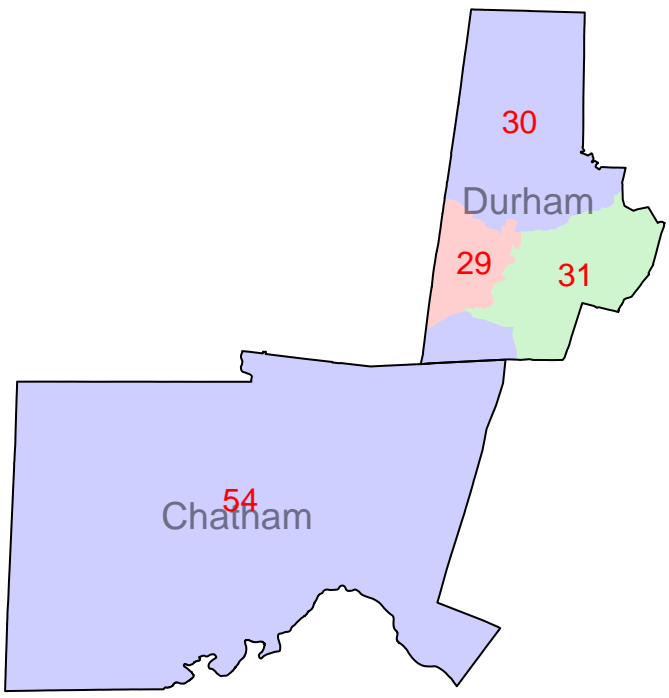
Chatham–Durham County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

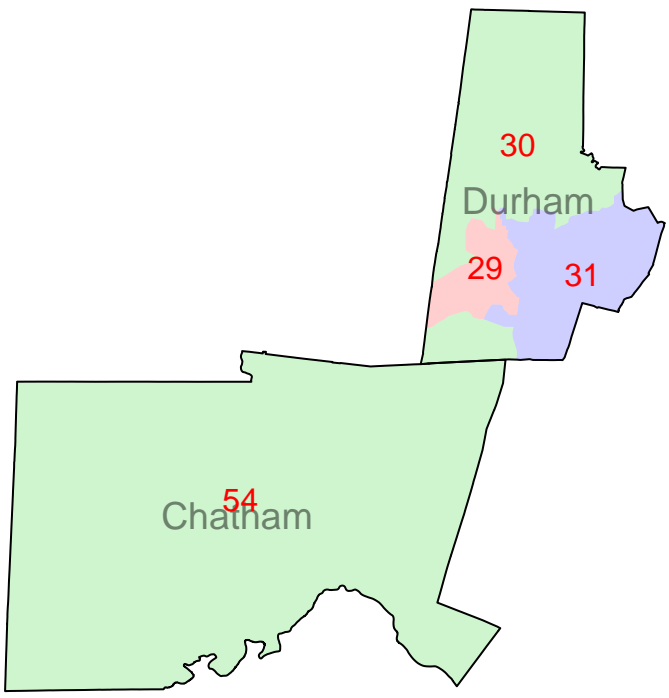
Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



29 (2017) 30 (2017) 31 (2017) 54 (2017)
Corresponding Districts in the Final House Bill 927 Plan (August 2017)



HOUSE_J_25_20170628.shp (Hofeller)



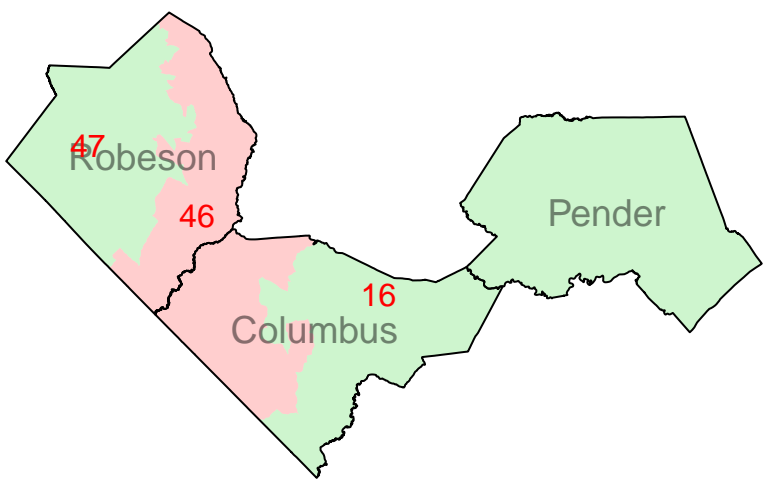
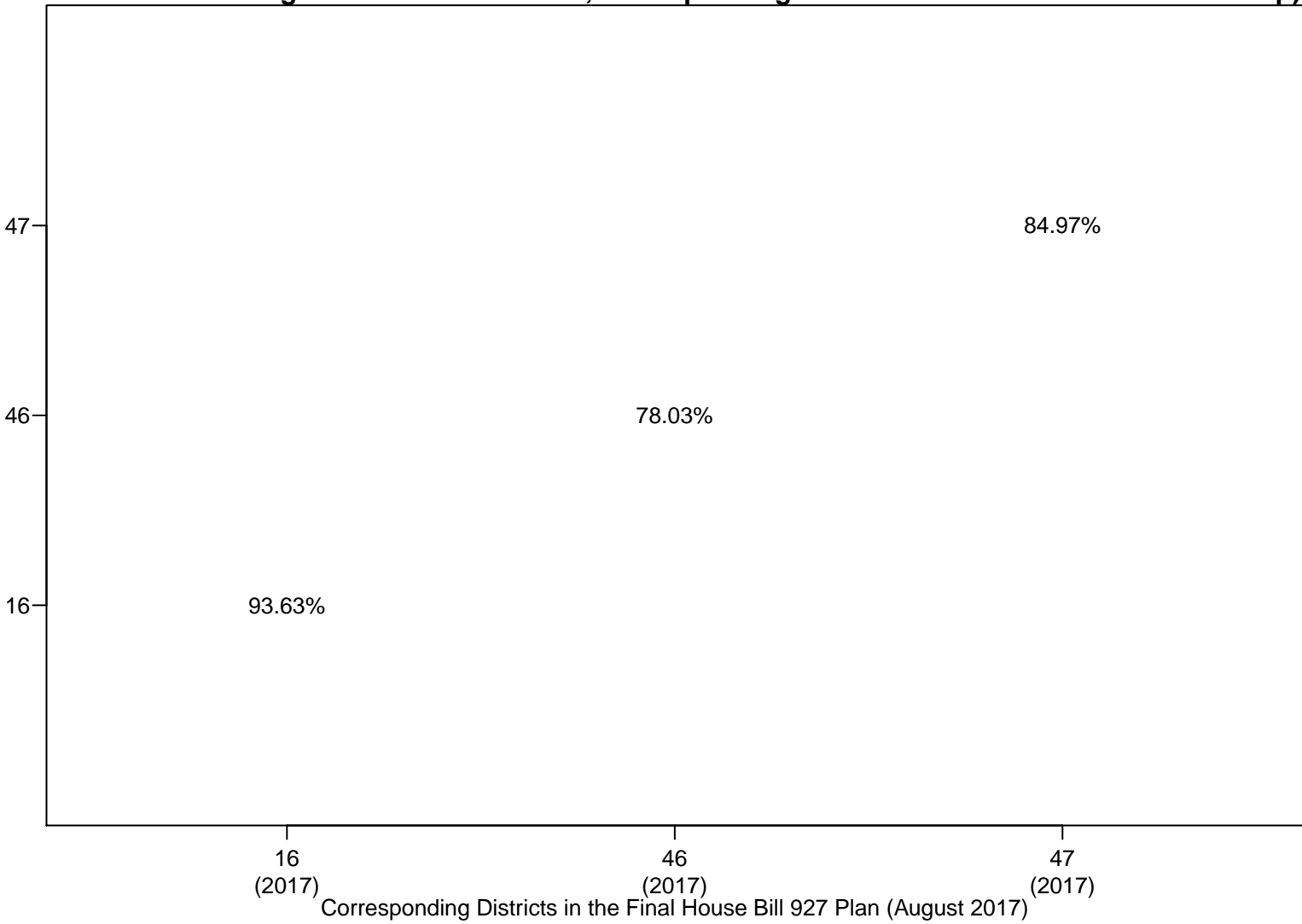
House Bill 927 Plan (4 Districts)

Figure 6:

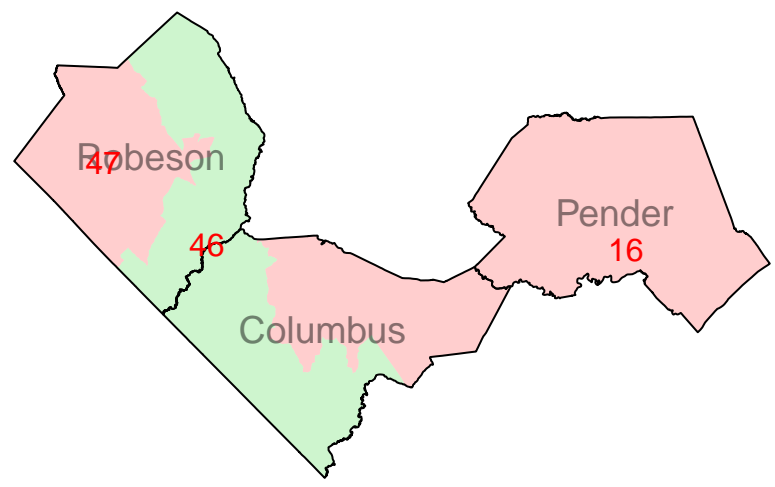
Columbus–Pender–Robeson County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



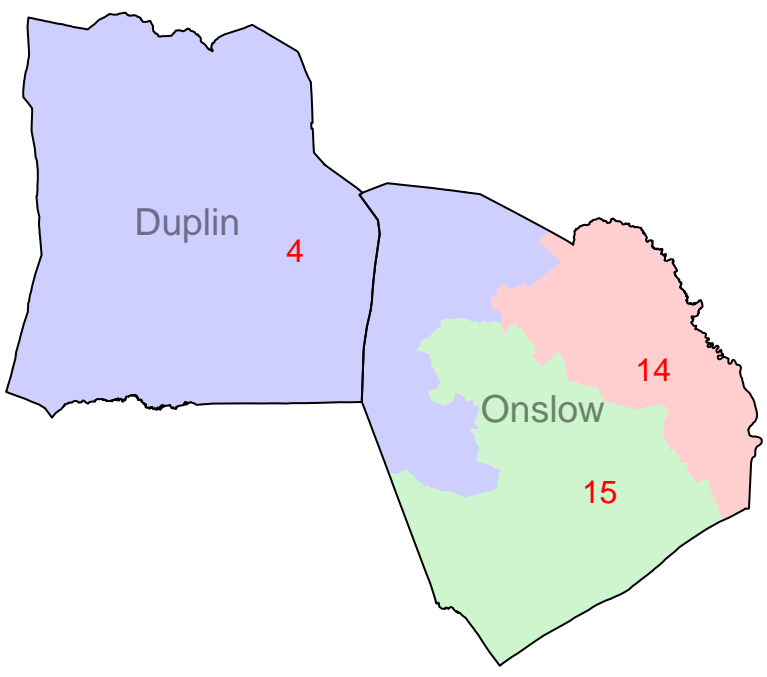
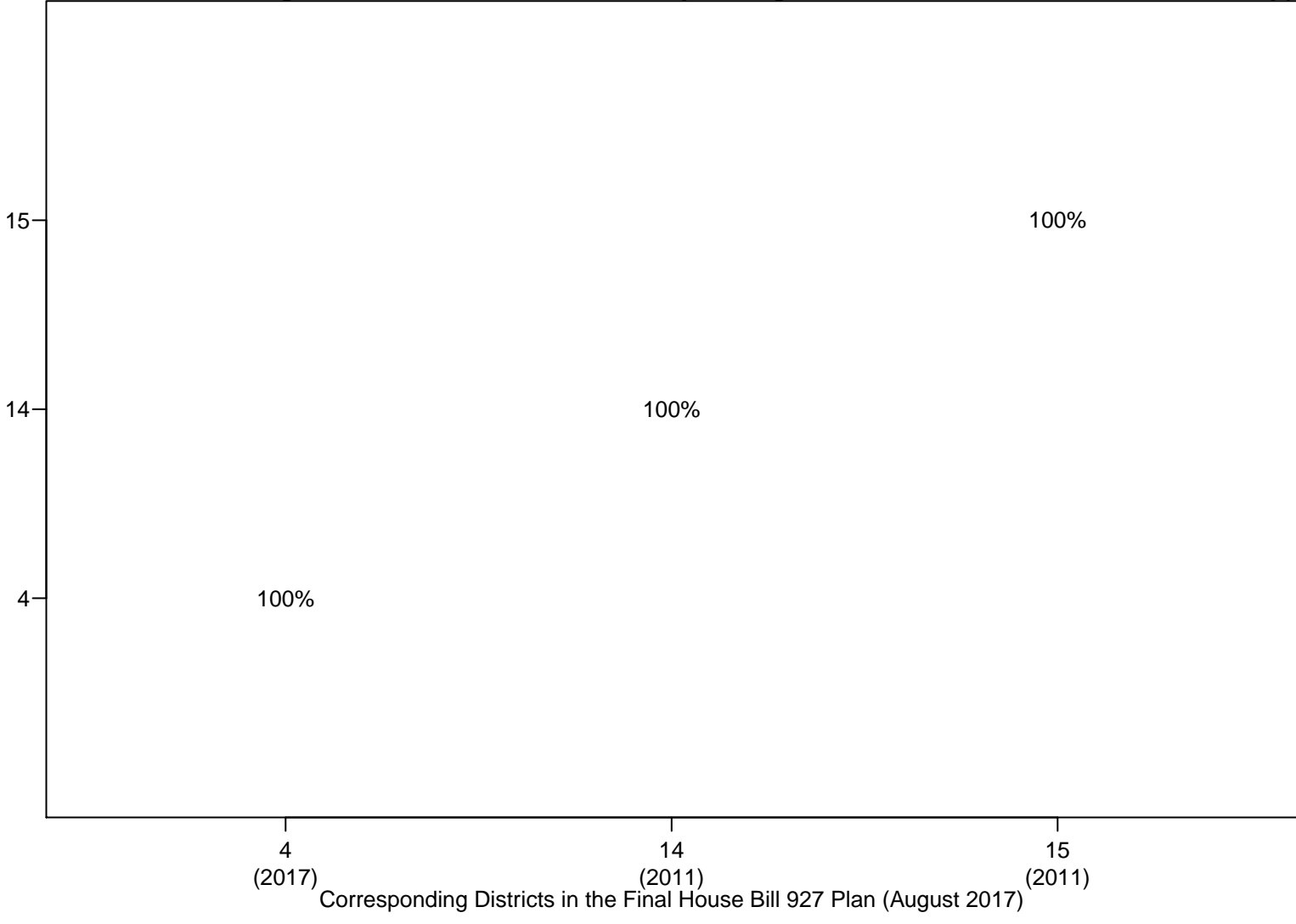
House Bill 927 Plan (3 Districts)

Figure 7:

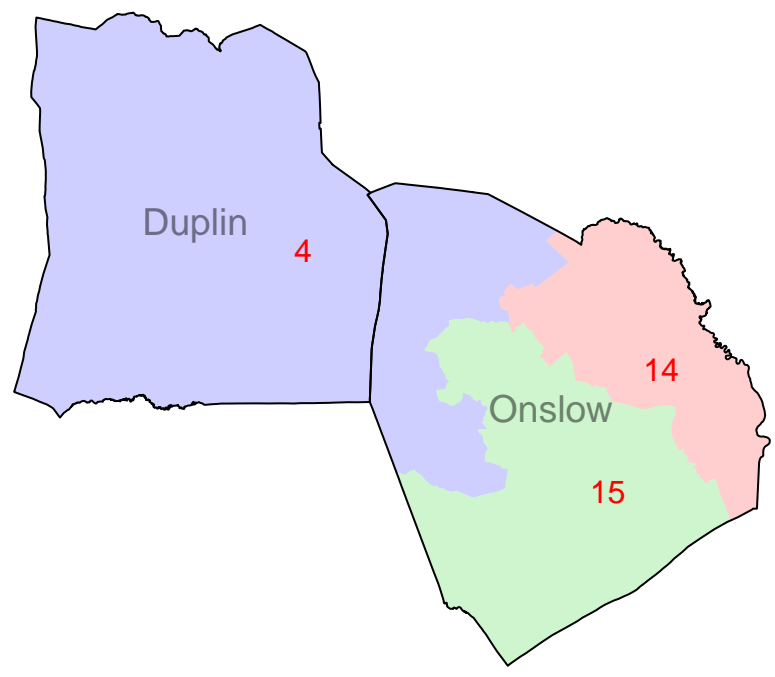
Duplin–Onslow County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



House Bill 927 Plan (3 Districts)

**Figure 8:
Forsyth–Yadkin County Grouping**

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map

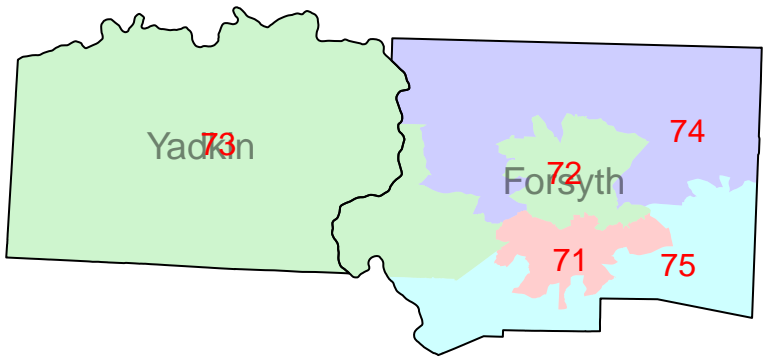
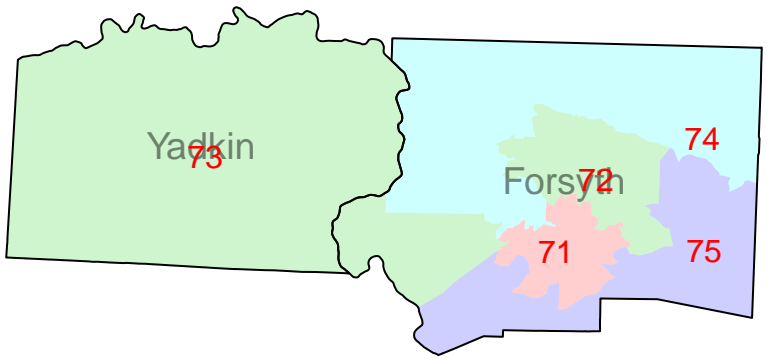
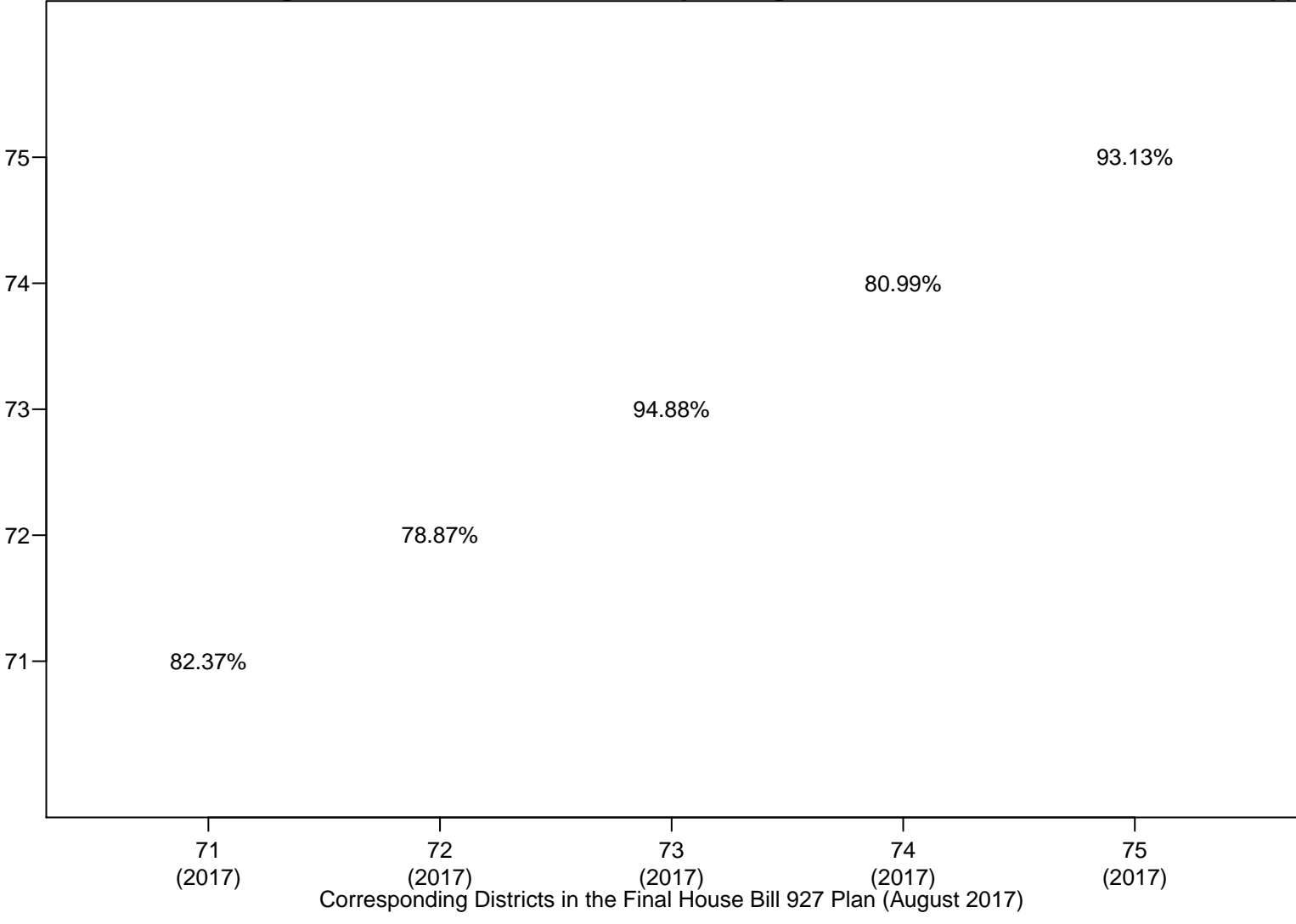


Figure 9:

Granville–Person–Vance–Warren County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map

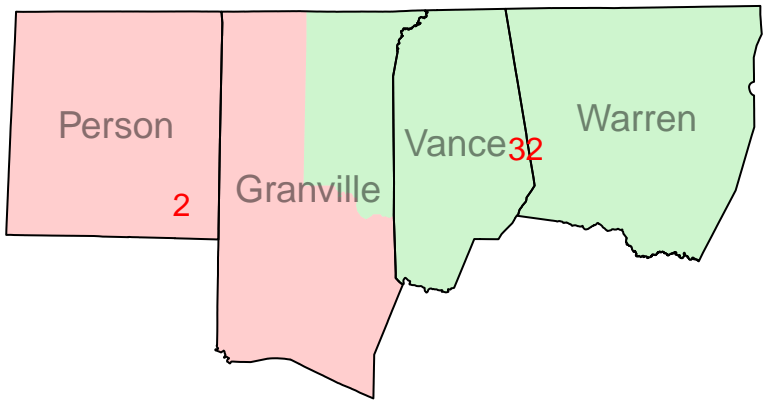
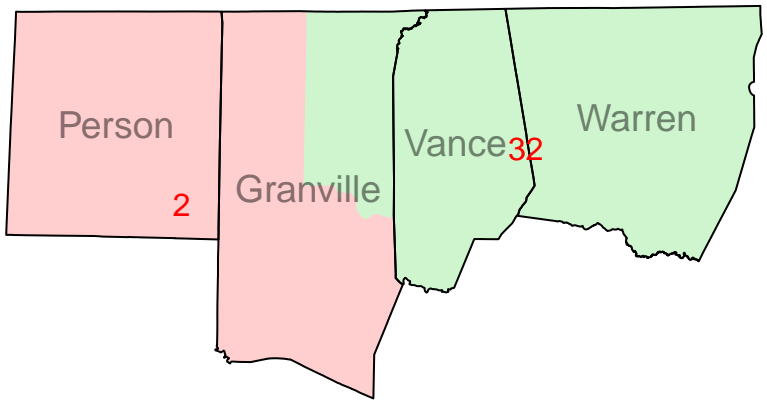
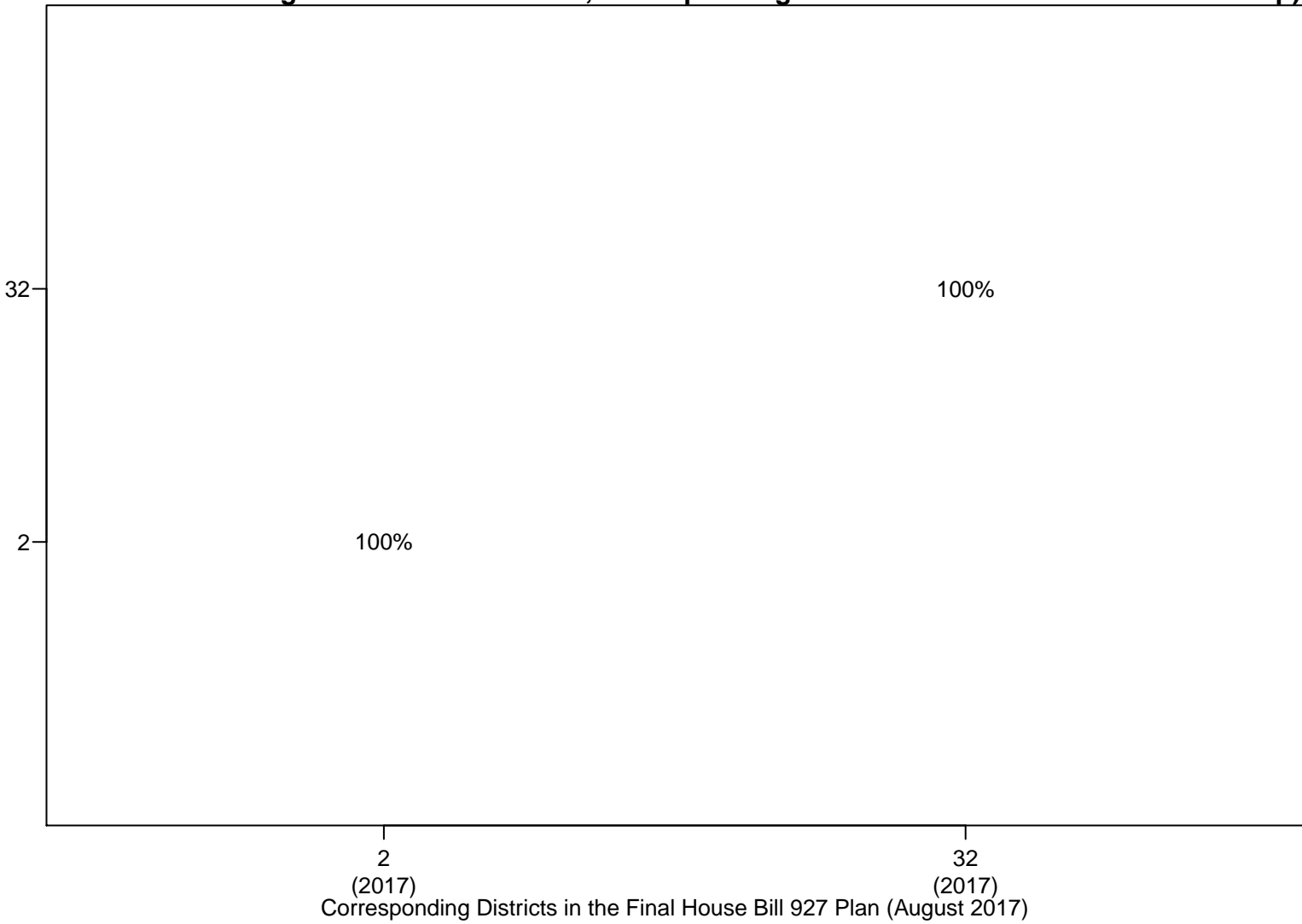
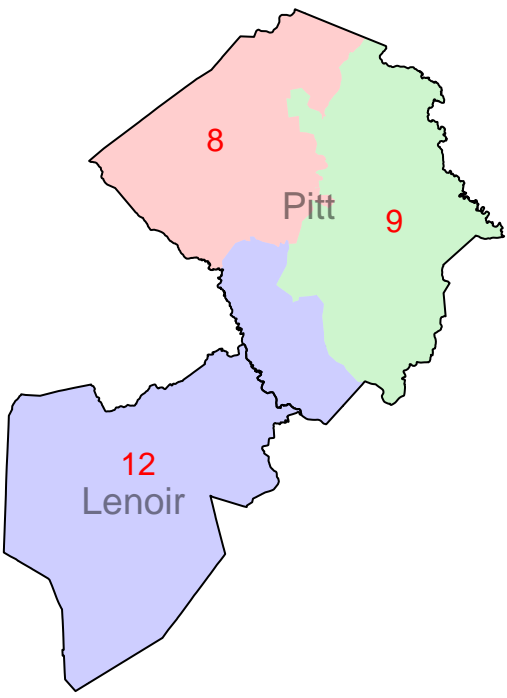
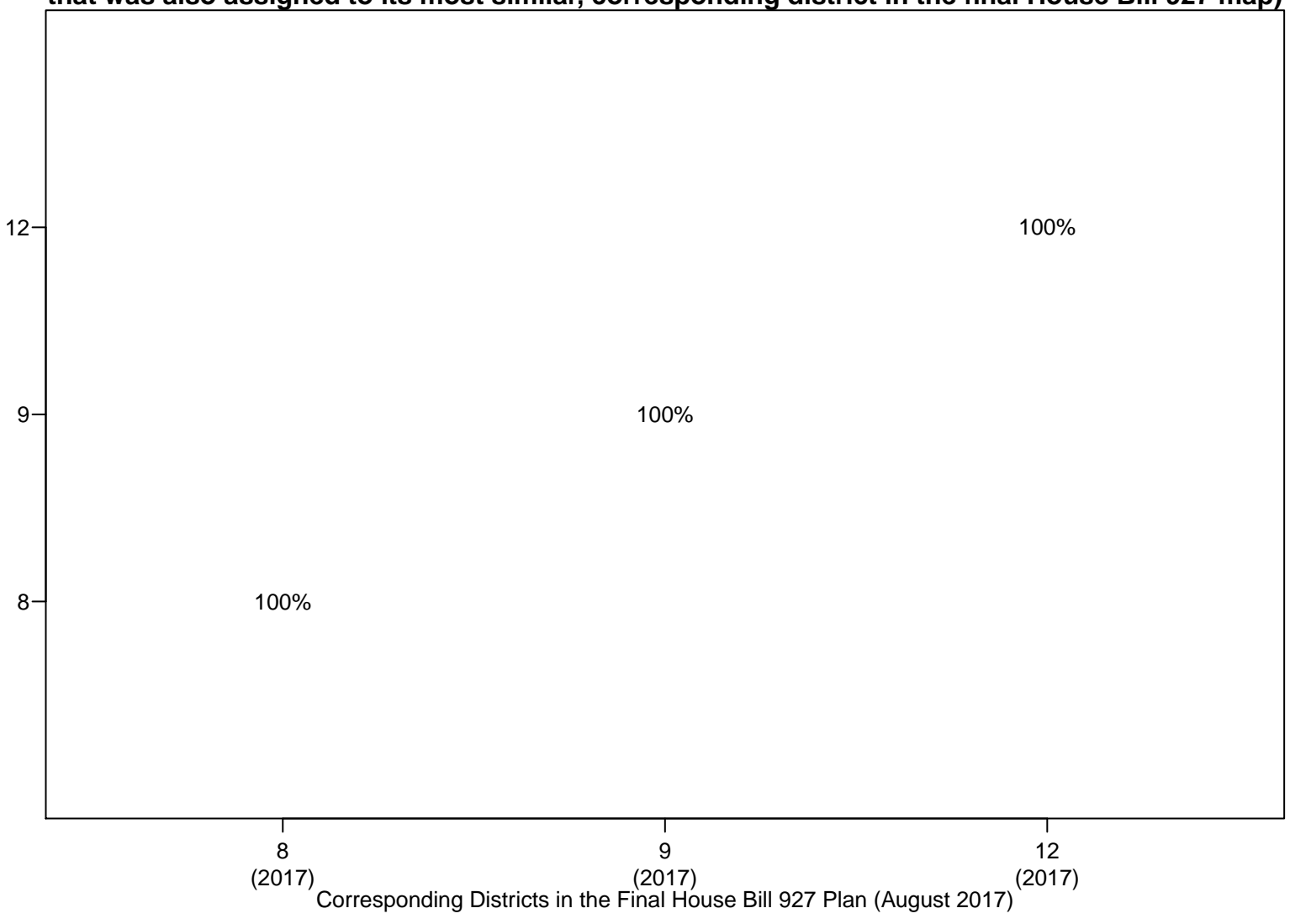


Figure 10:

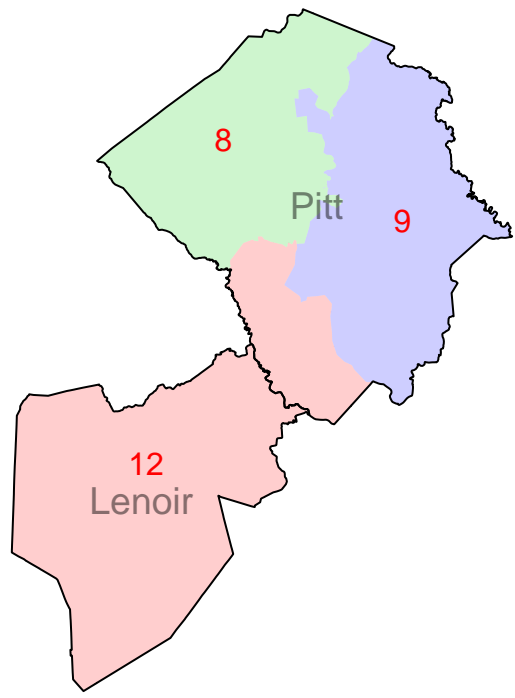
Lenoir-Pitt County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



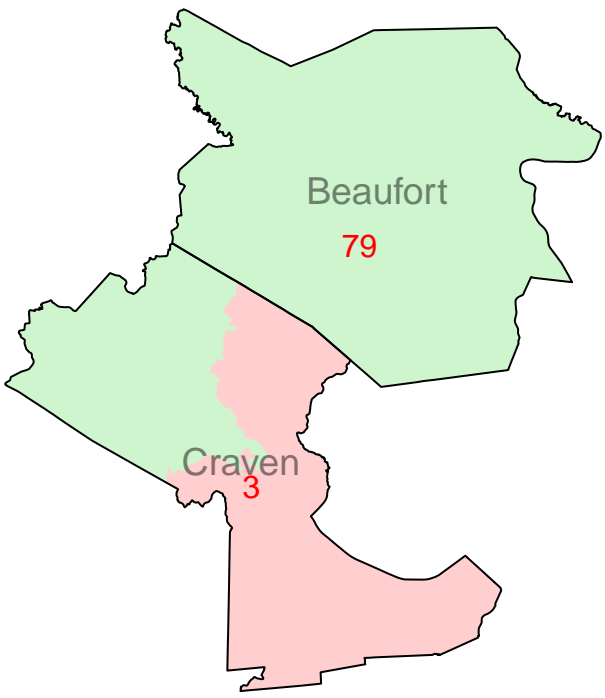
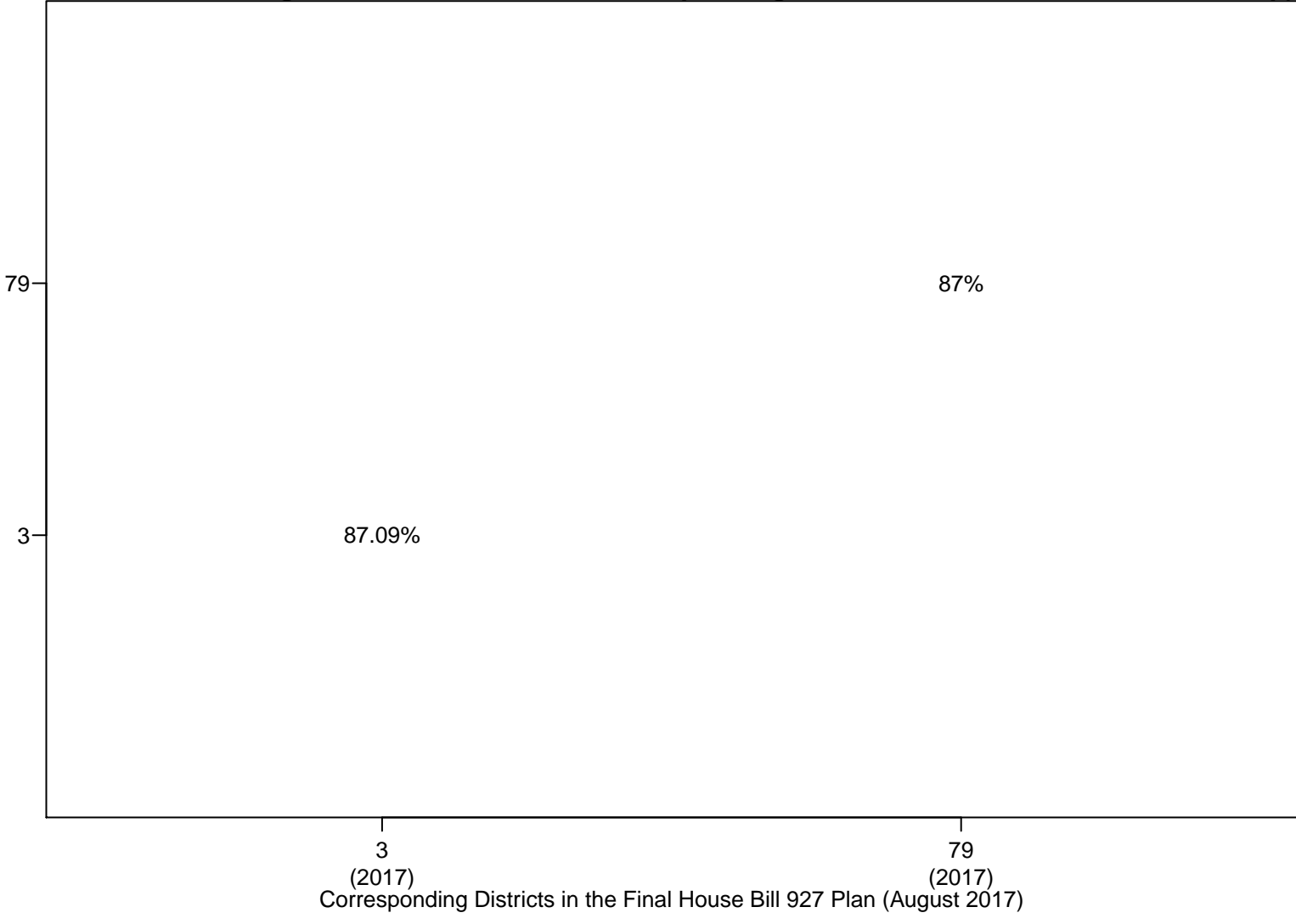
House Bill 927 Plan (3 Districts)

Figure 11:

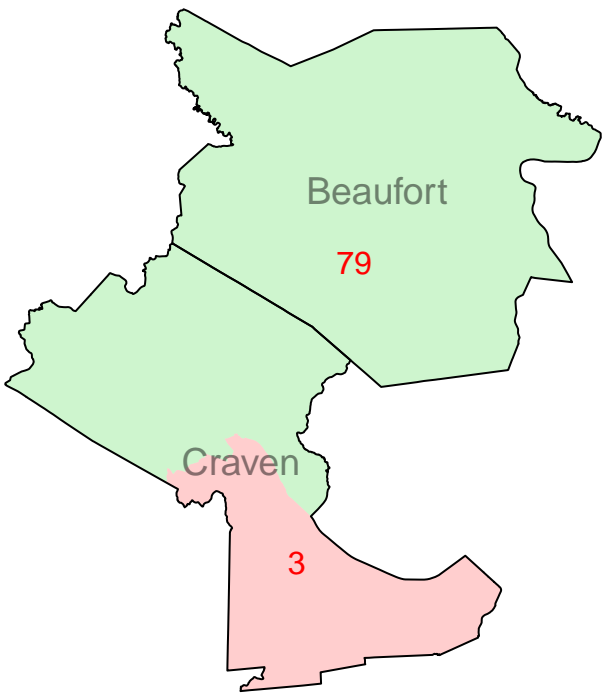
Beaufort-Craven County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)

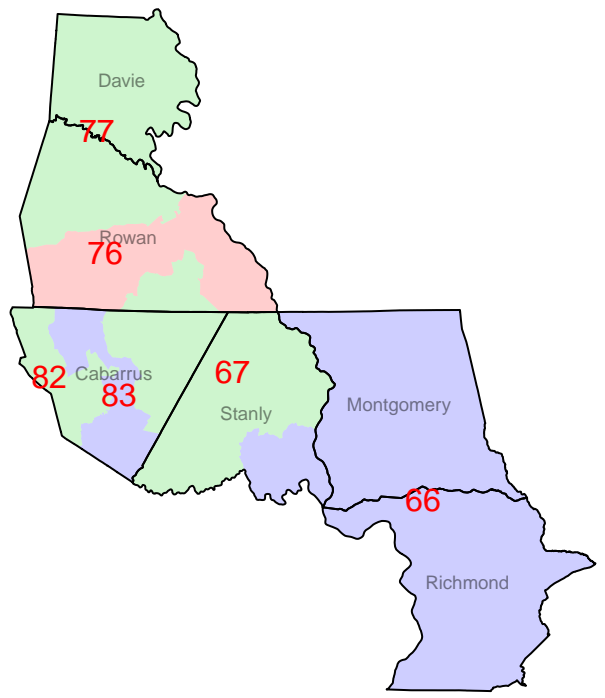
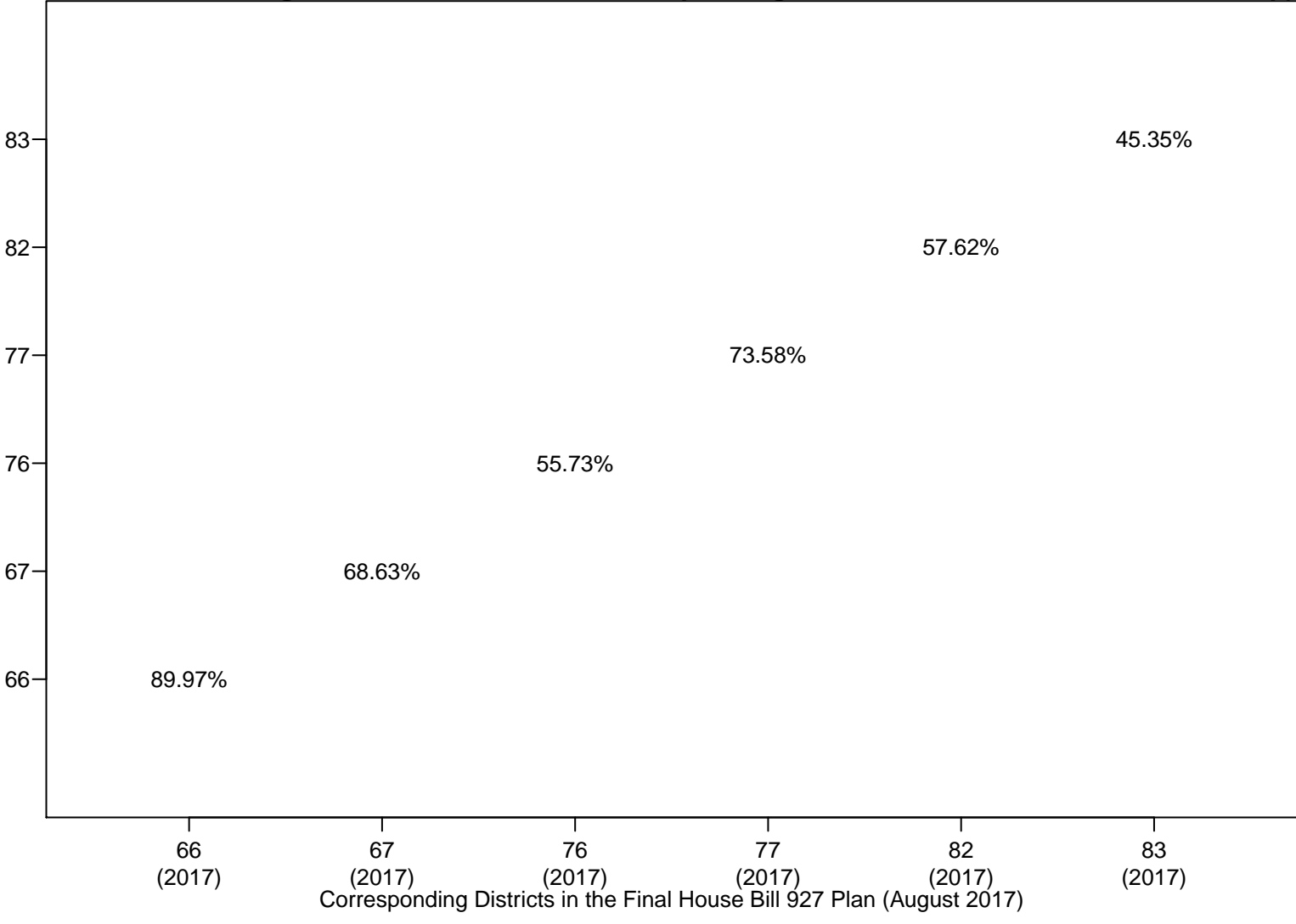


House Bill 927 Plan (2 Districts)

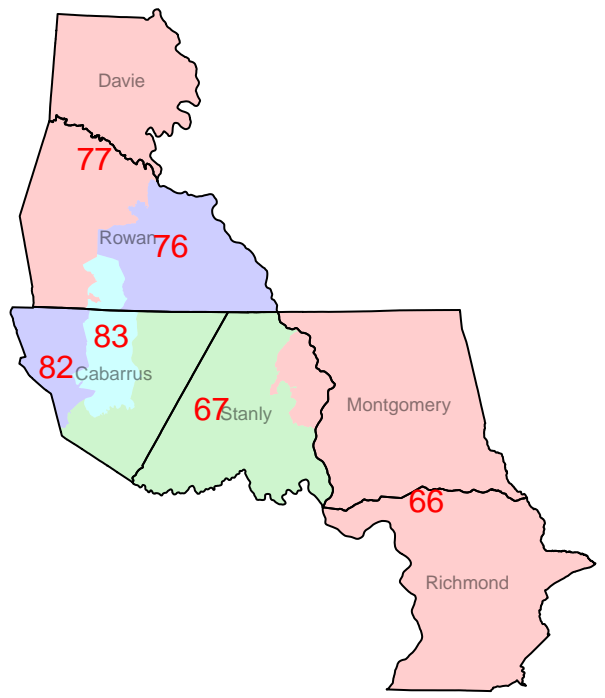
Figure 12:

Cabarrus–Davie–Montgomery–Richmond–Stanly County Grouping
(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



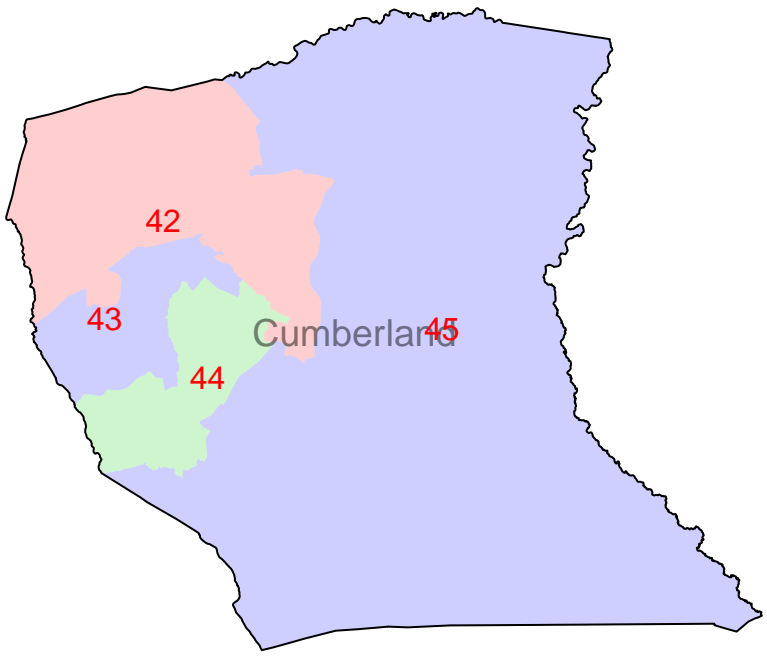
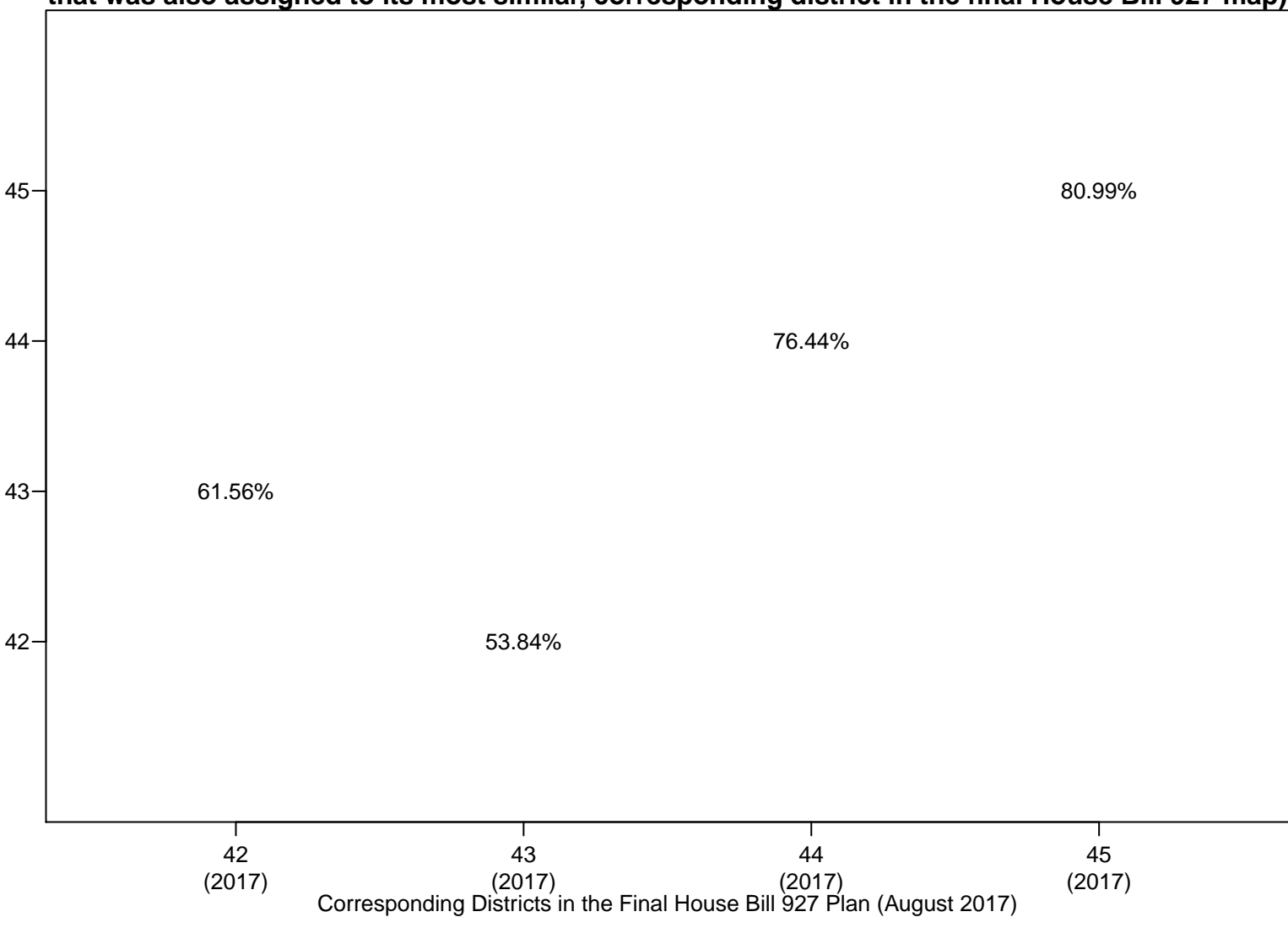
House Bill 927 Plan (6 Districts)

Figure 13:

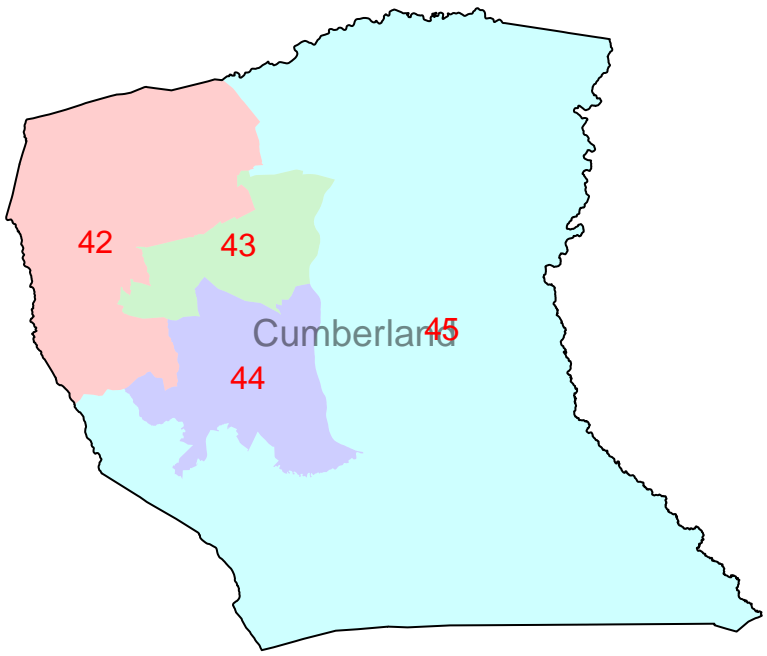
Cumberland County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)



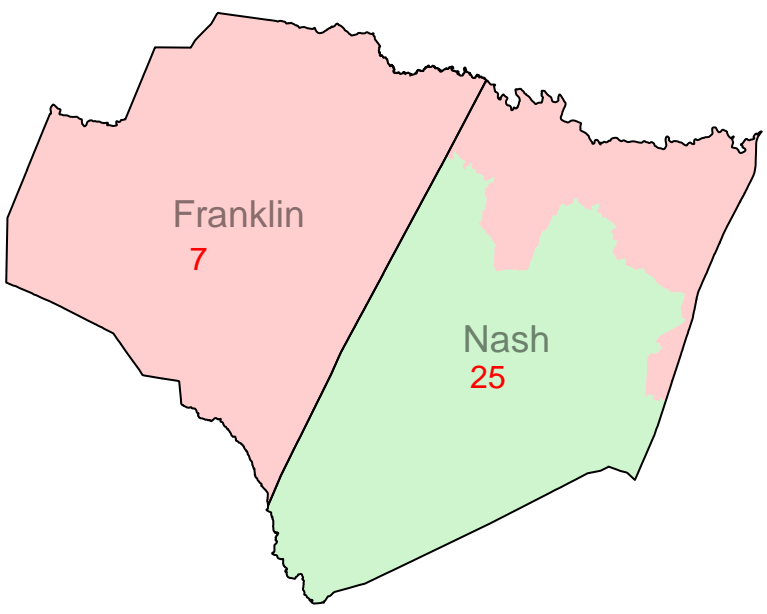
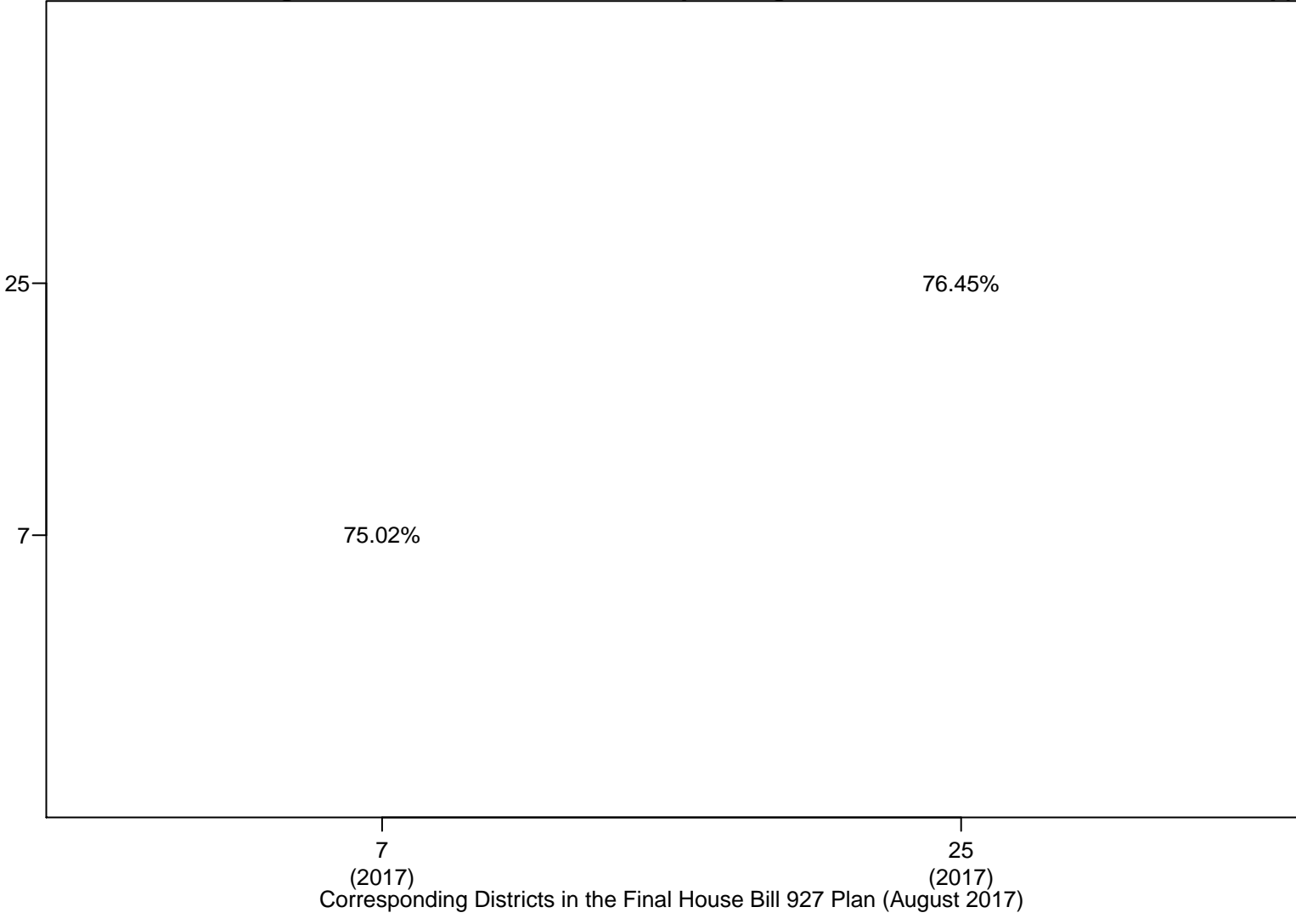
House Bill 927 Plan (4 Districts)

Figure 14:

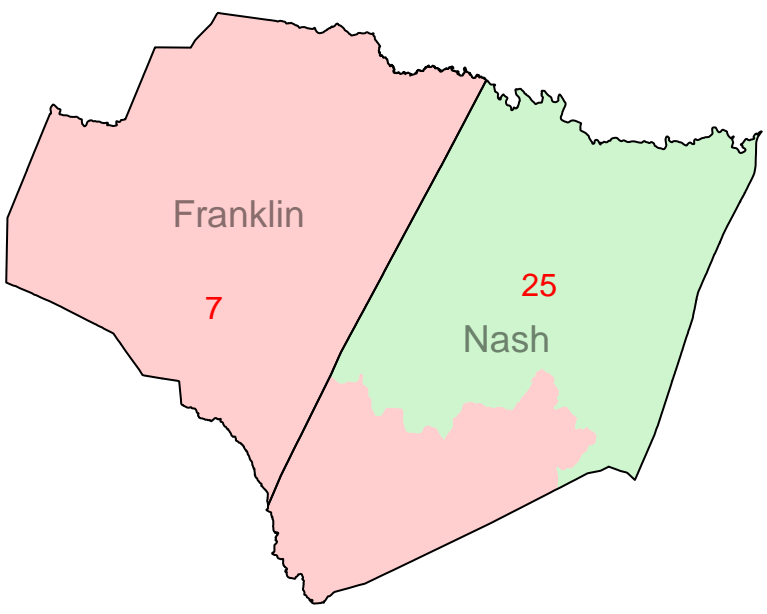
Franklin–Nash County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



HOUSE_J_25_20170628.shp (Hofeller)

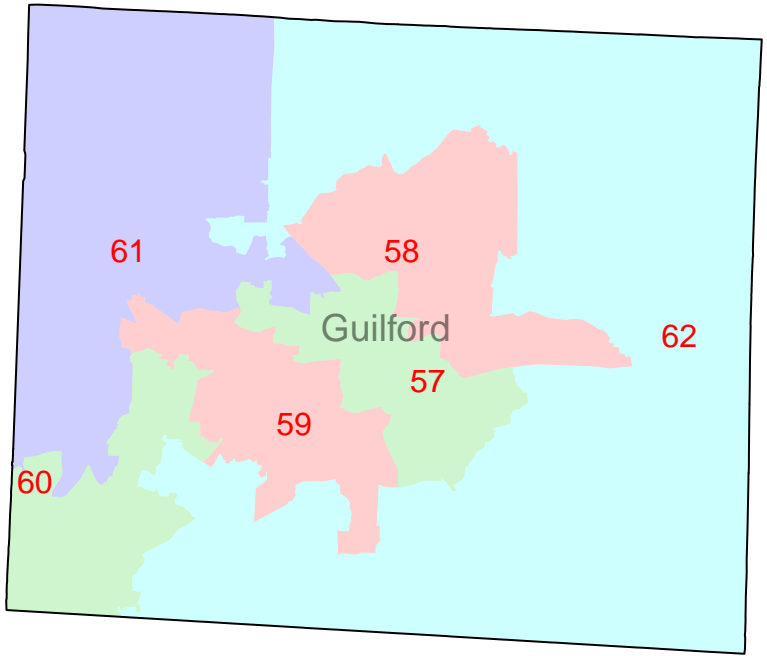
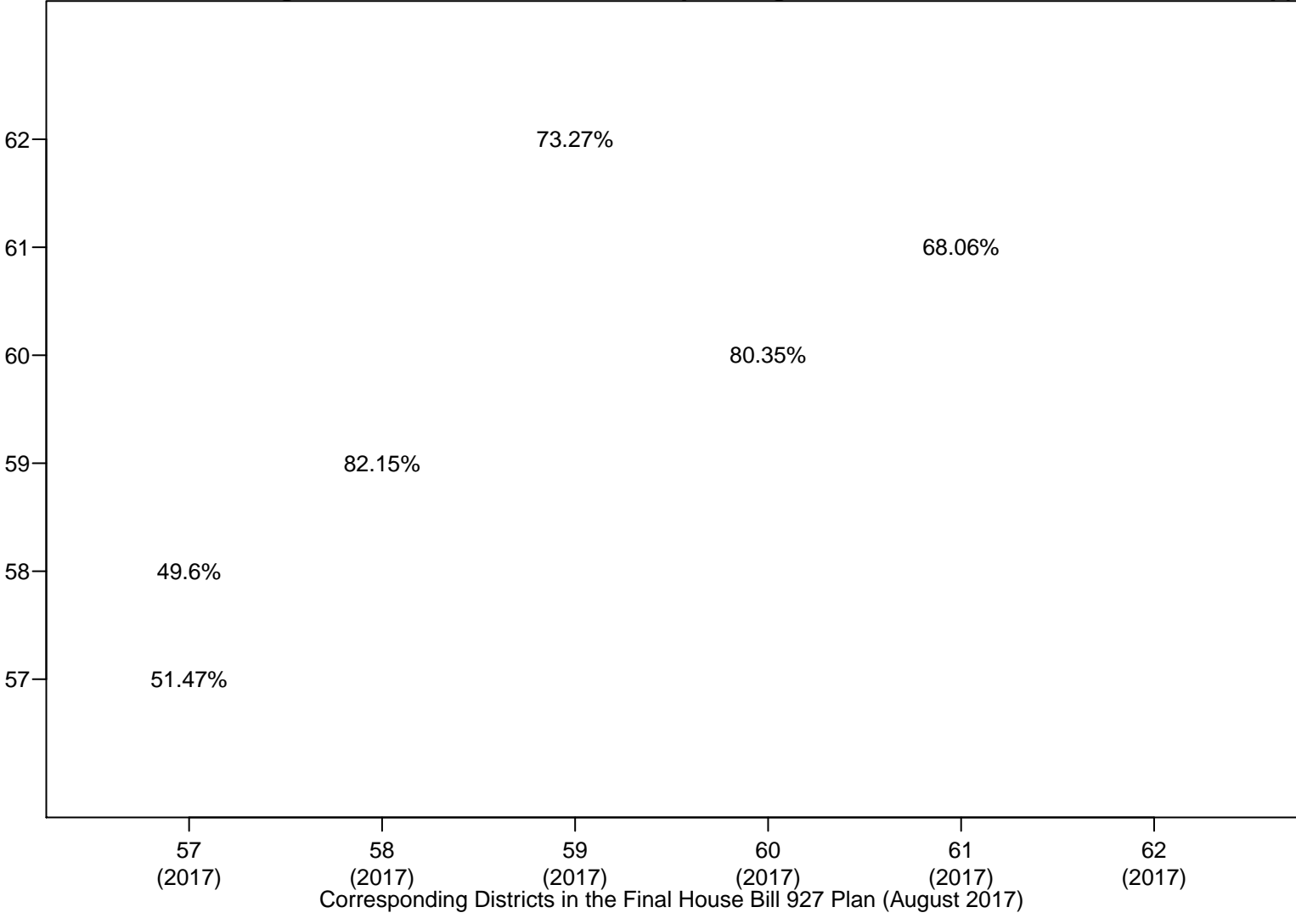


House Bill 927 Plan (2 Districts)

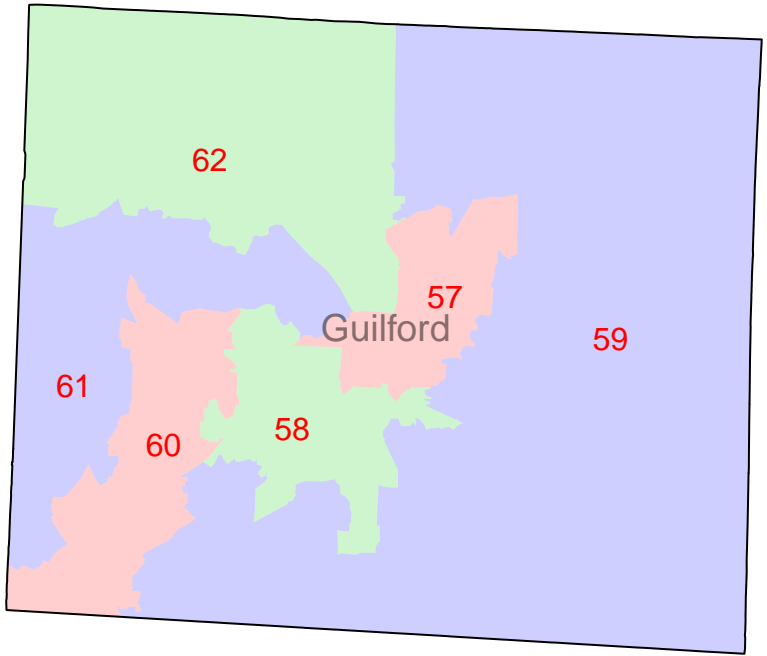
**Figure 15:
Guilford County Grouping**

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)

Districts in Dr. Hofeller's Draft 'HOUSE_J_25_20170628' Map



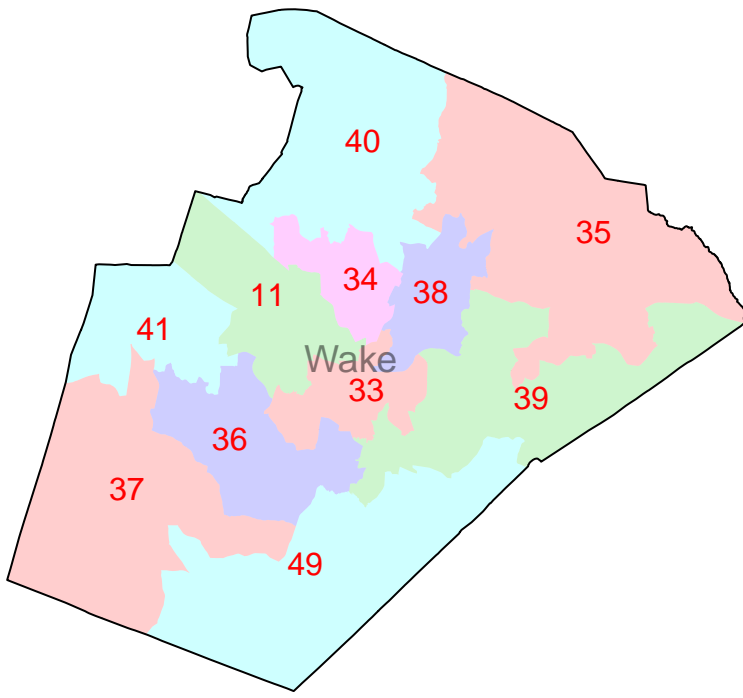
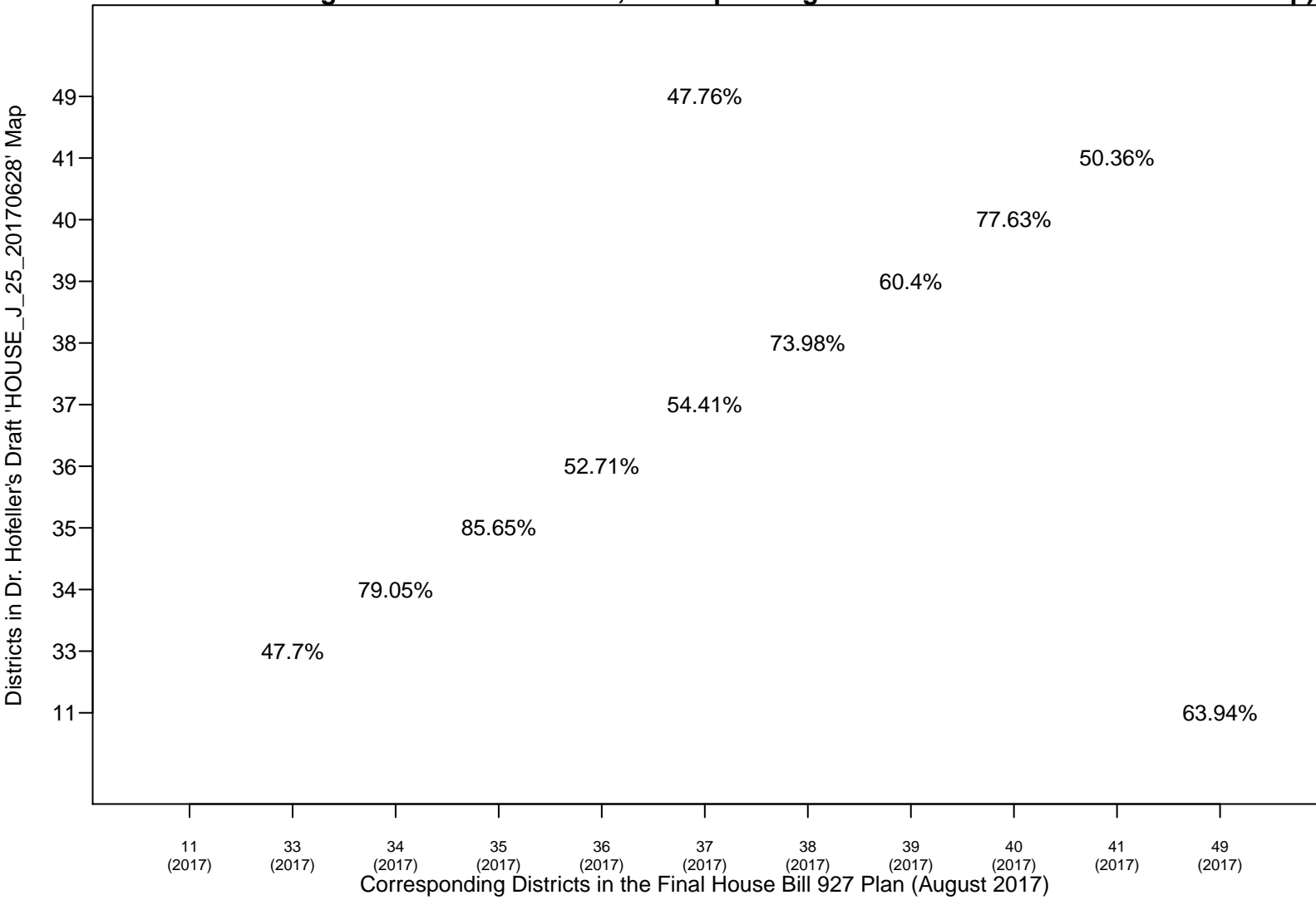
HOUSE_J_25_20170628.shp (Hofeller)



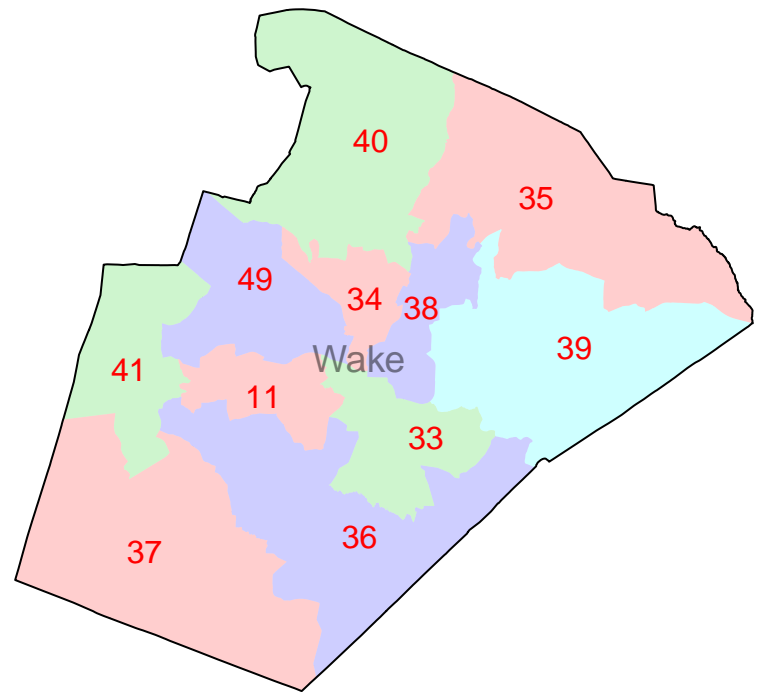
House Bill 927 Plan (6 Districts)

**Figure 16:
Wake County Grouping**

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_25' districts that was also assigned to its most similar, corresponding district in the final House Bill 927 map)



HOUSE_J_25_20170628.shp (Hofeller)



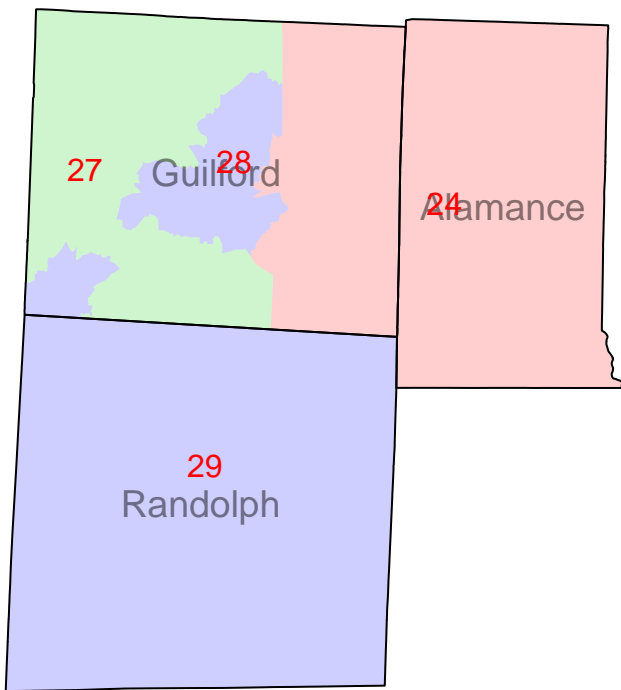
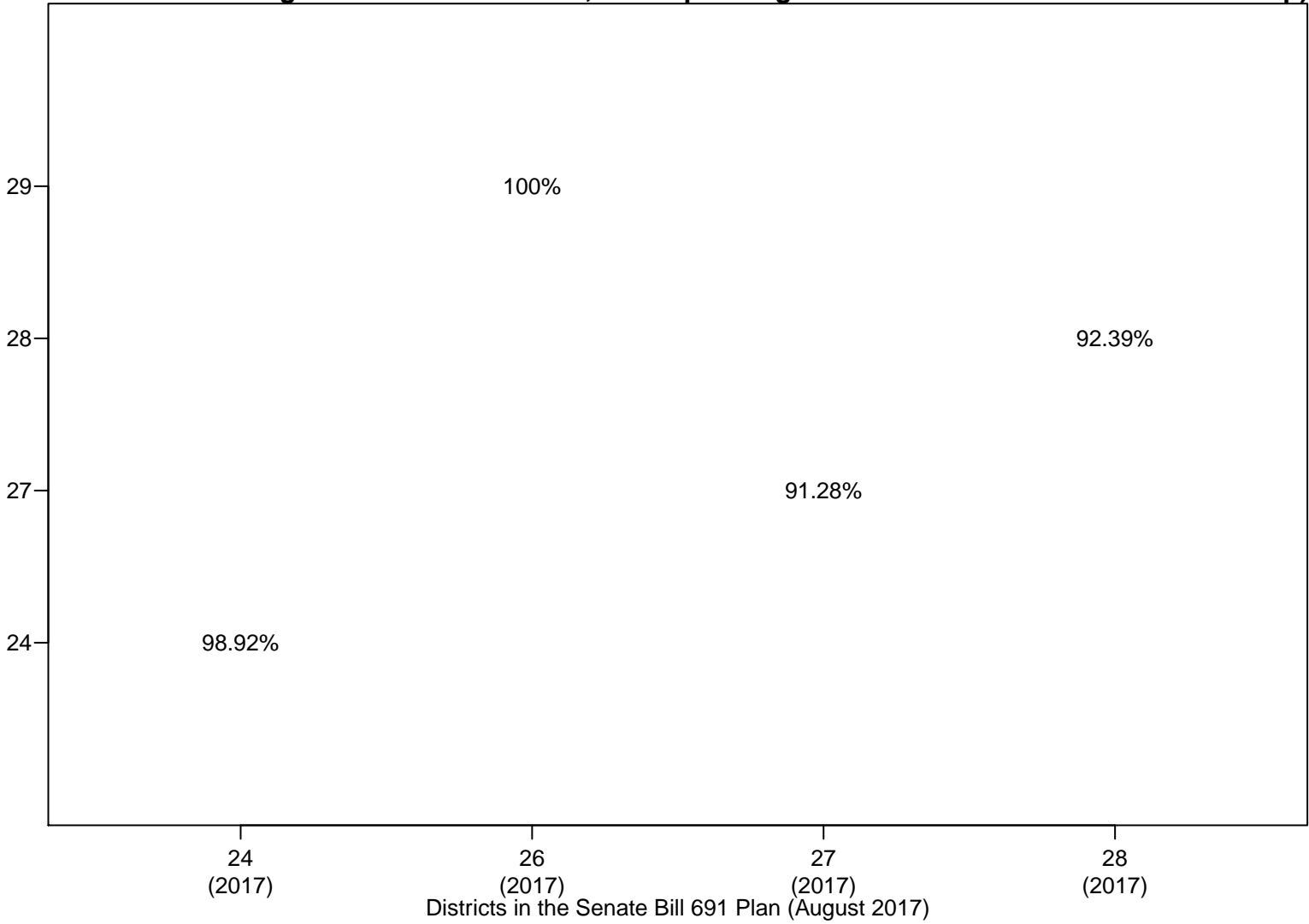
House Bill 927 Plan (11 Districts)

Figure 17

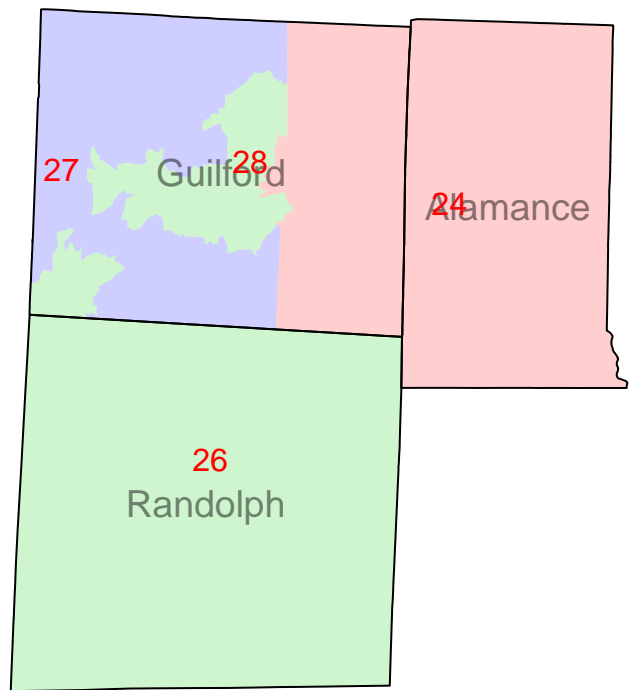
Alamance–Guilford–Randolph County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



SENATE_J_24_20170624.shp (Hofeller)



Senate Bill 691 Plan (4 Districts)

Figure 18

Alleghany-Ashe-Caswell-Rockingham-Stokes-Surry-Watauga-Wilkes County Grouping
(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map

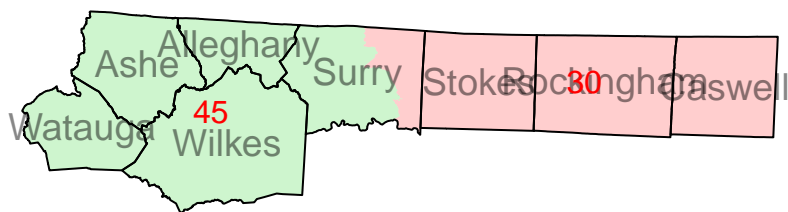
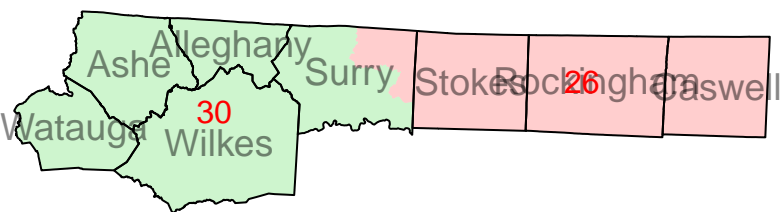
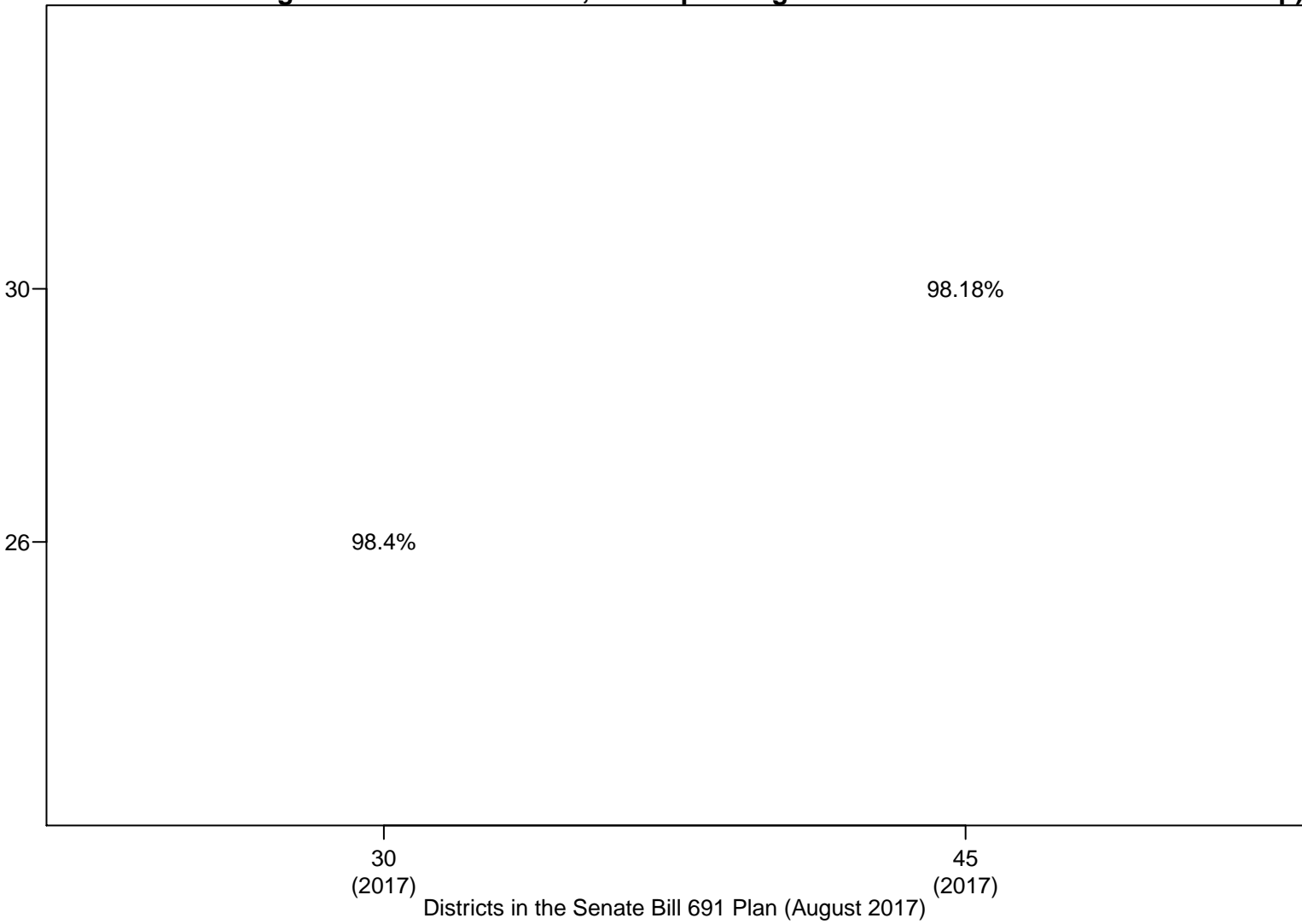
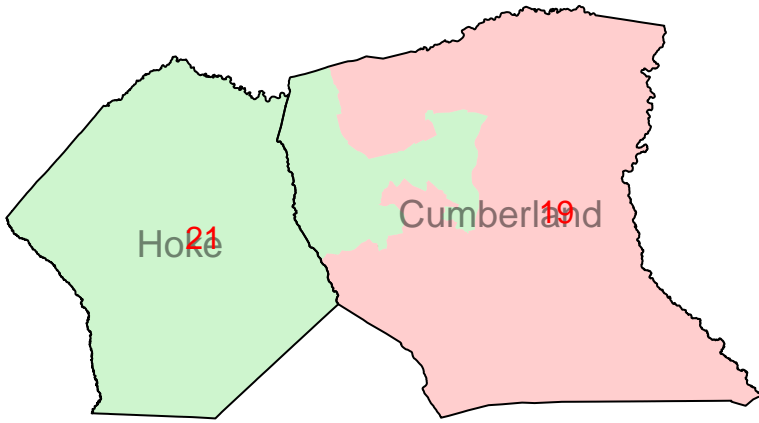
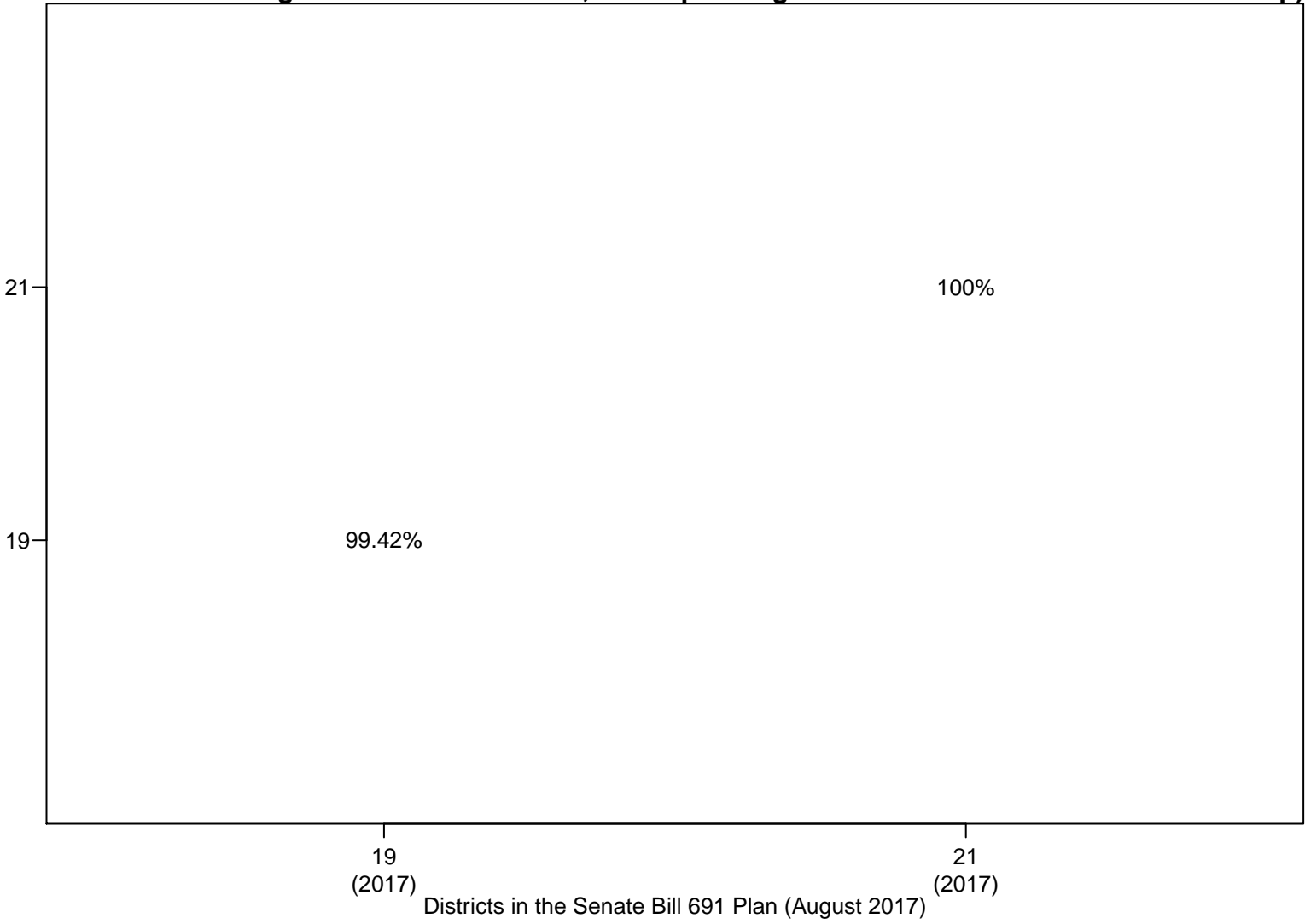


Figure 19

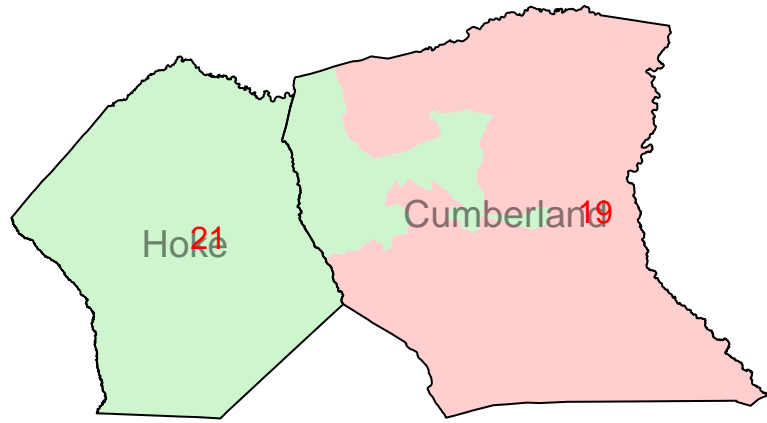
Cumberland-Hoke County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



SENATE_J_24_20170624.shp (Hofeller)



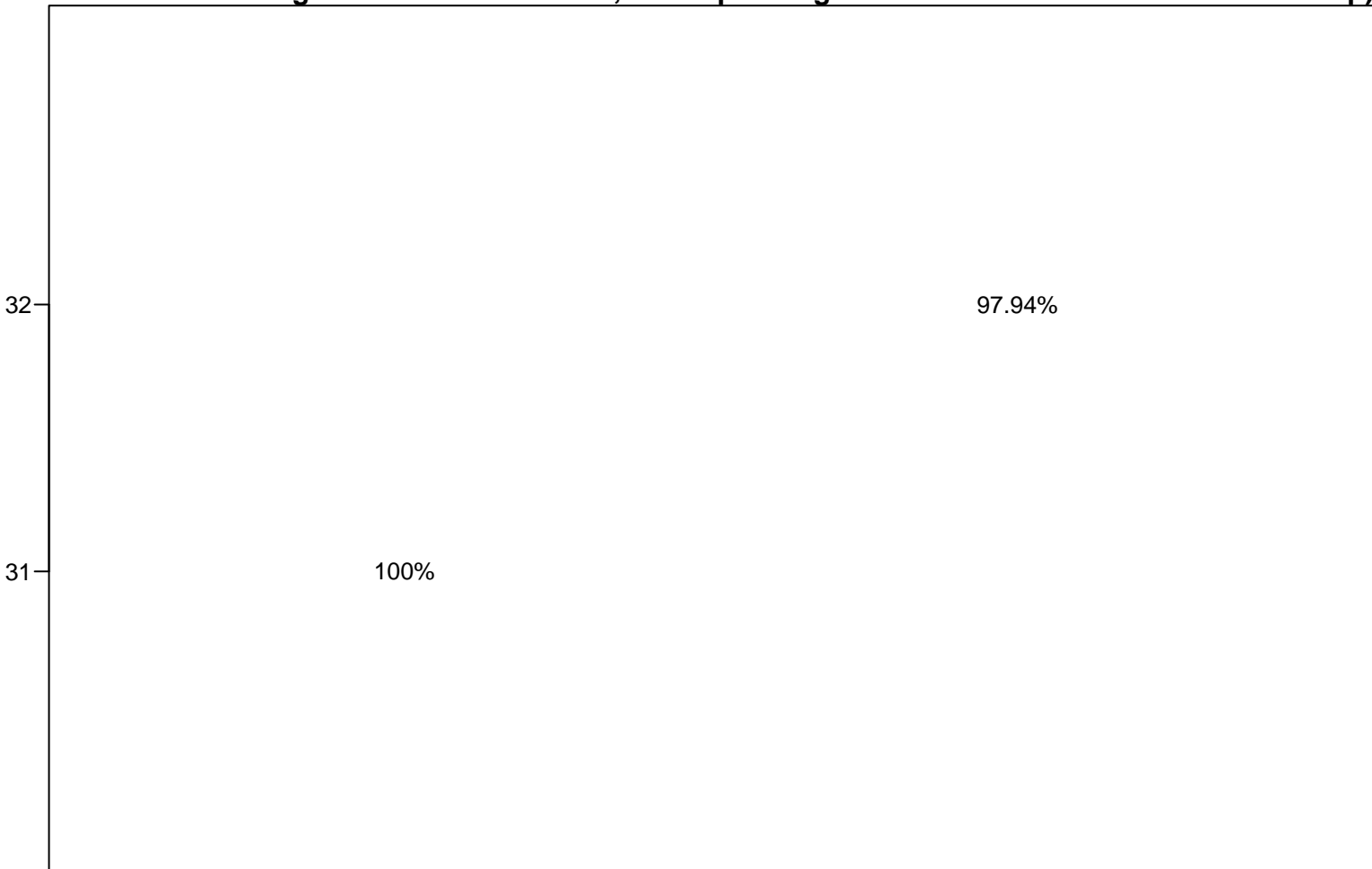
Senate Bill 691 Plan (2 Districts)

Figure 20

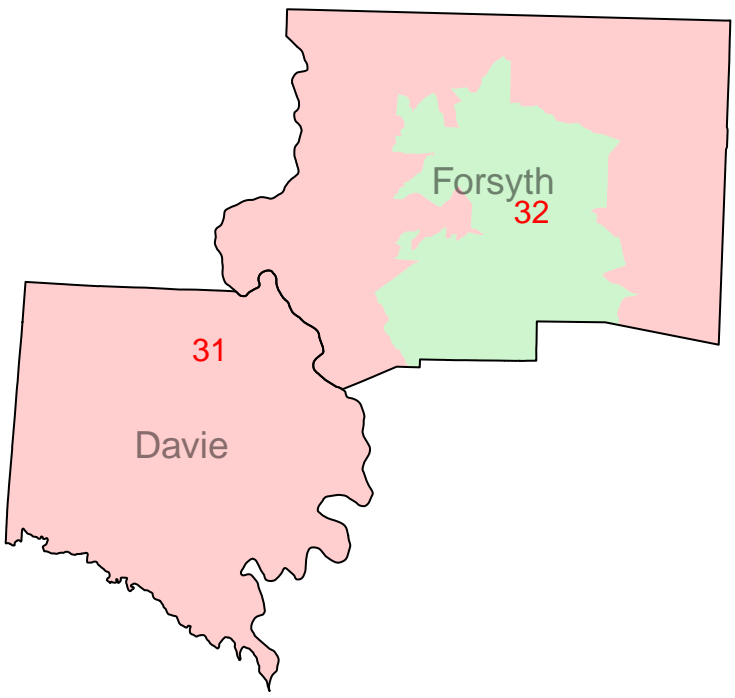
Davie-Forsyth County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

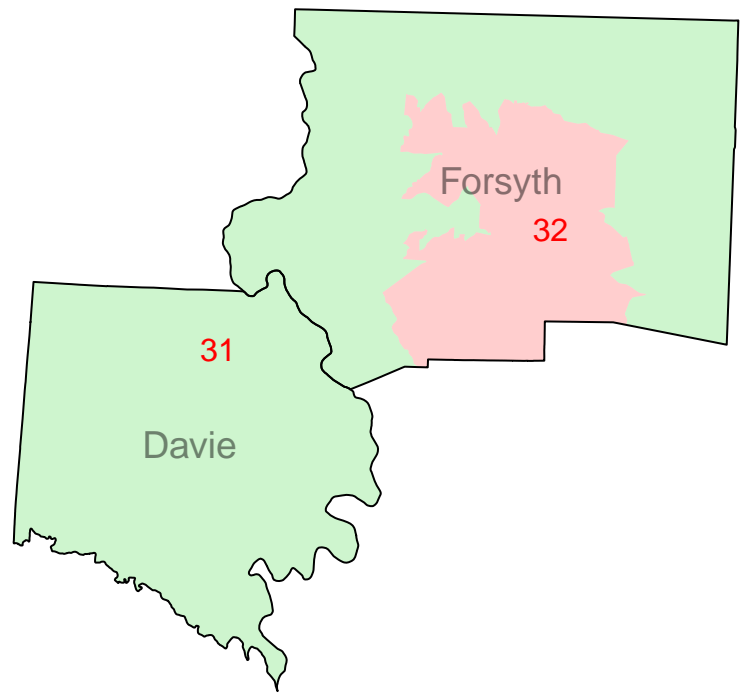
Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



31 (2017) 32 (2017)
Districts in the Senate Bill 691 Plan (August 2017)



SENATE_J_24_20170624.shp (Hofeller)



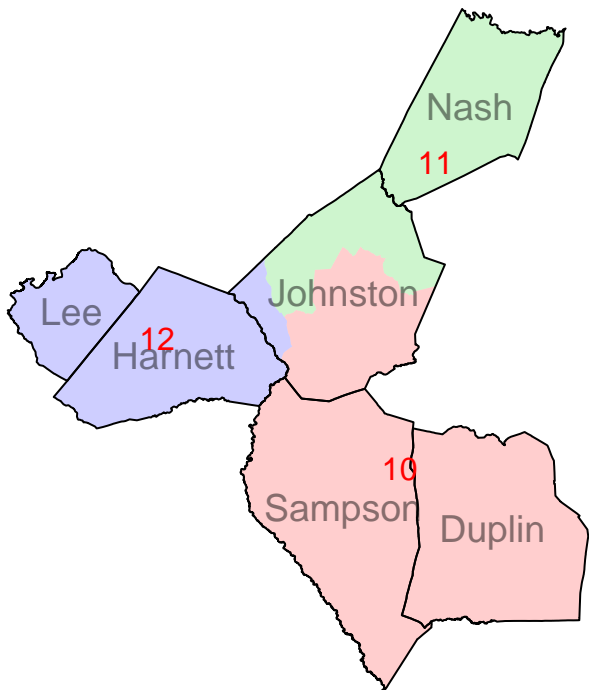
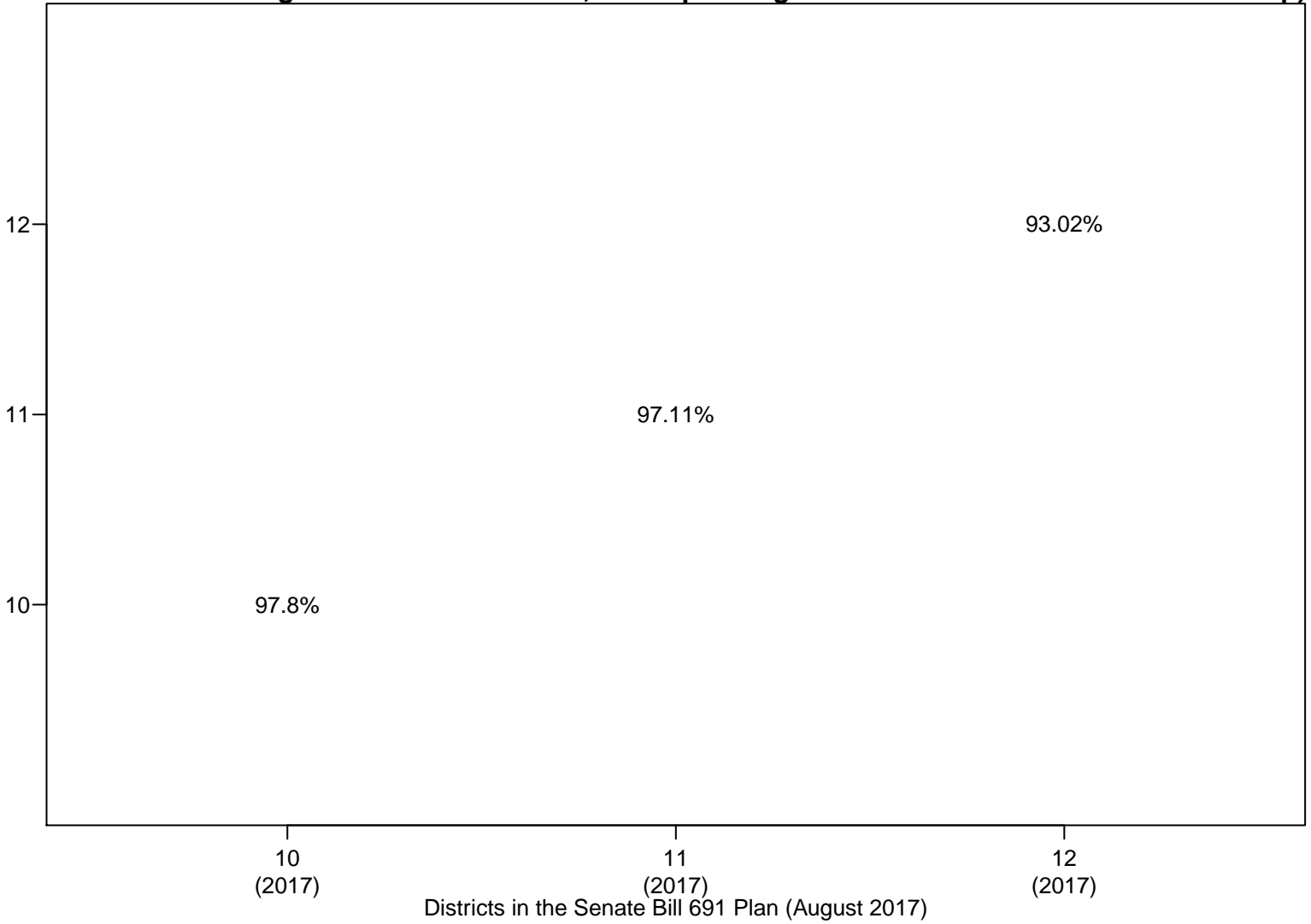
Senate Bill 691 Plan (2 Districts)

Figure 21

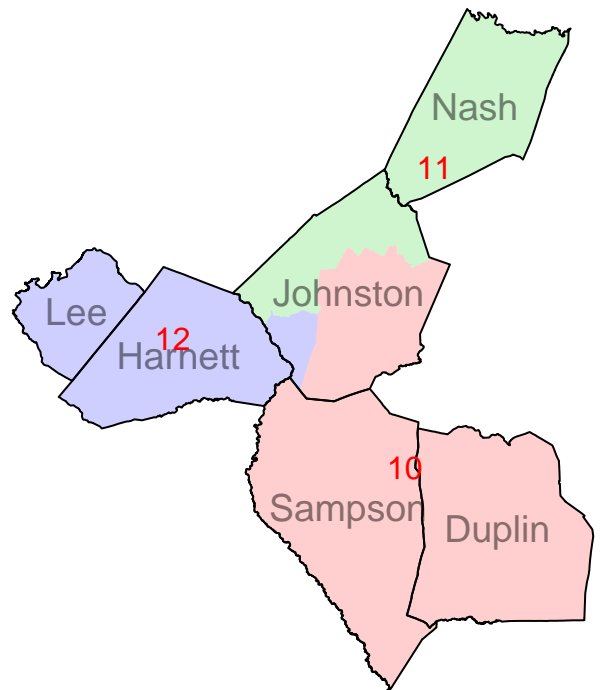
Duplin-Harnett-Johnston-Lee-Nash-Sampson County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



SENATE_J_24_20170624.shp (Hofeller)



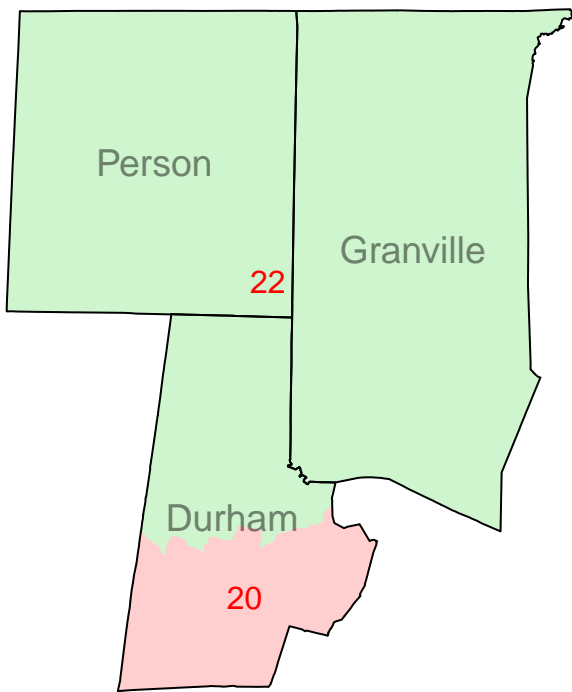
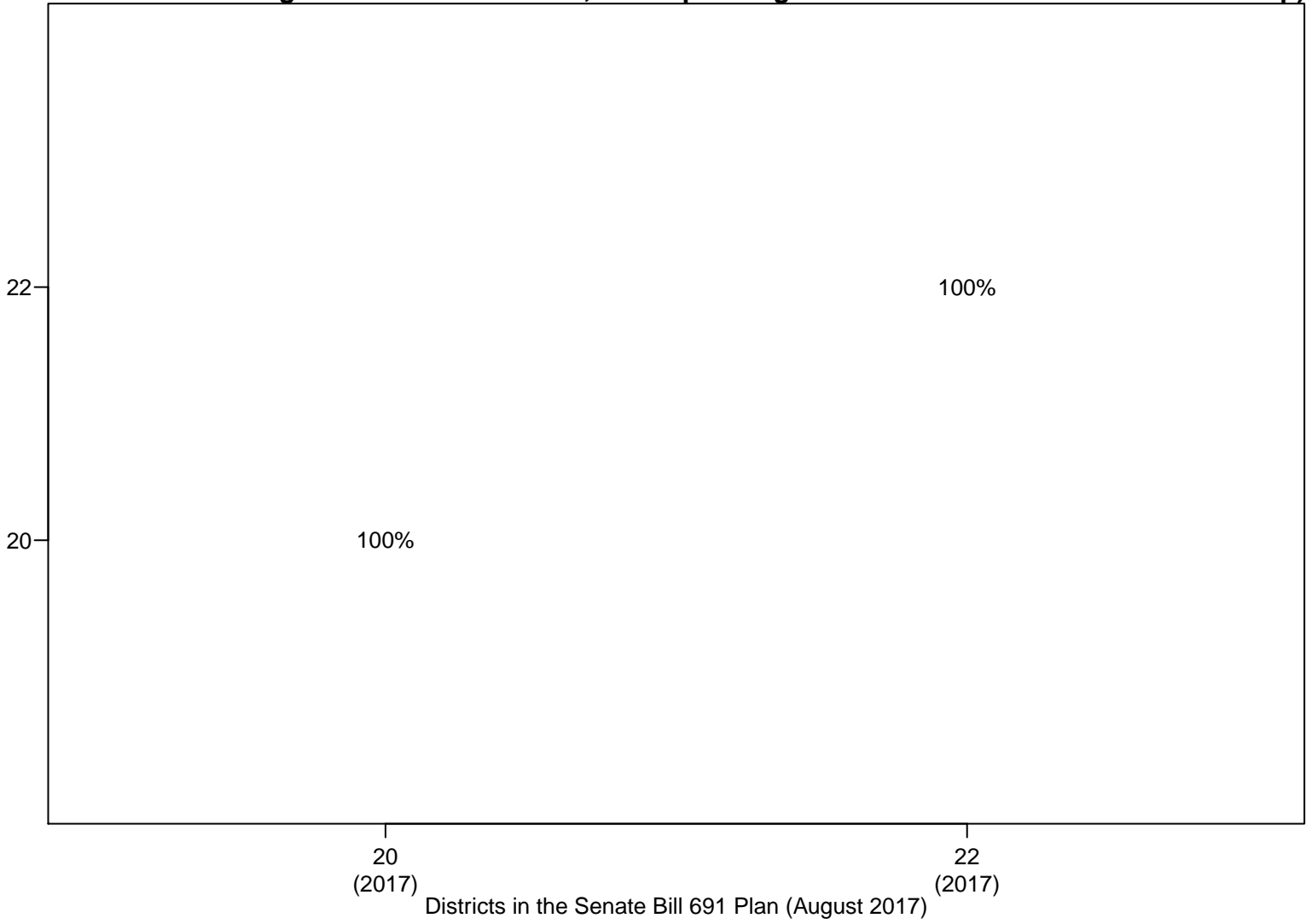
Senate Bill 691 Plan (3 Districts)

Figure 22

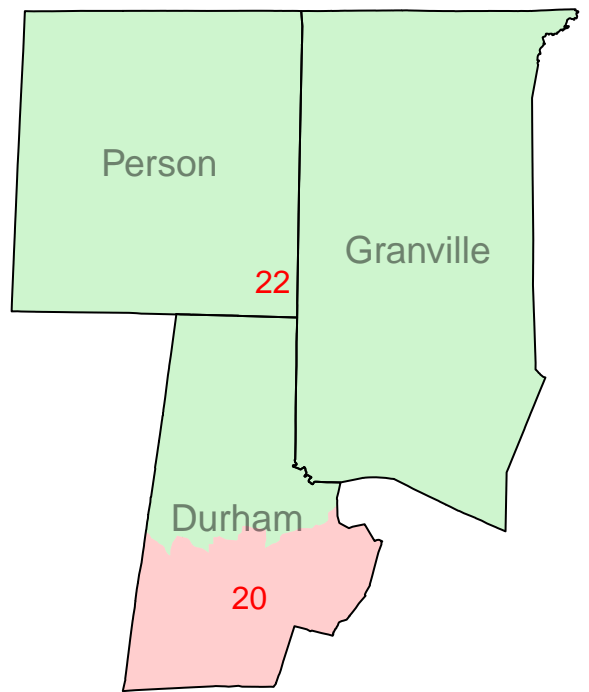
Durham–Granville–Person County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



SENATE_J_24_20170624.shp (Hofeller)



Senate Bill 691 Plan (2 Districts)

Figure 23

Franklin–Wake County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map

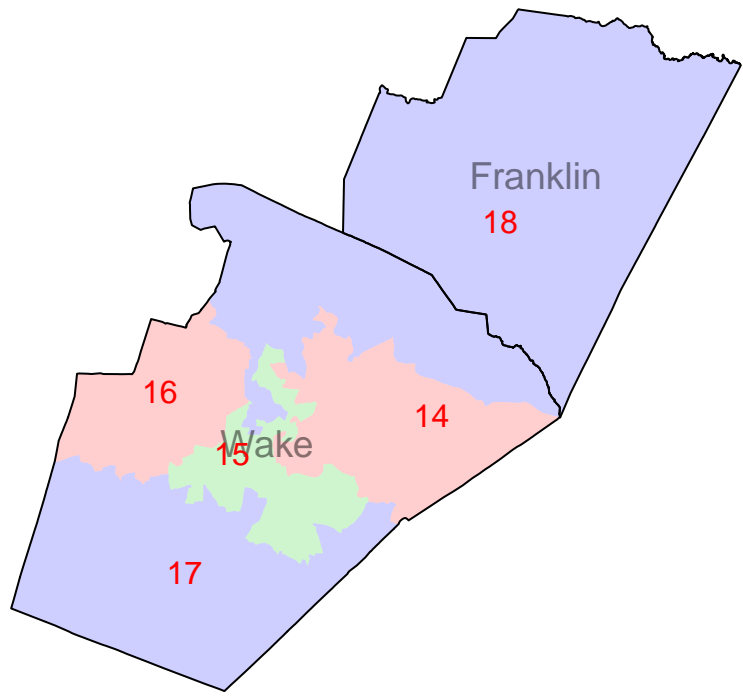
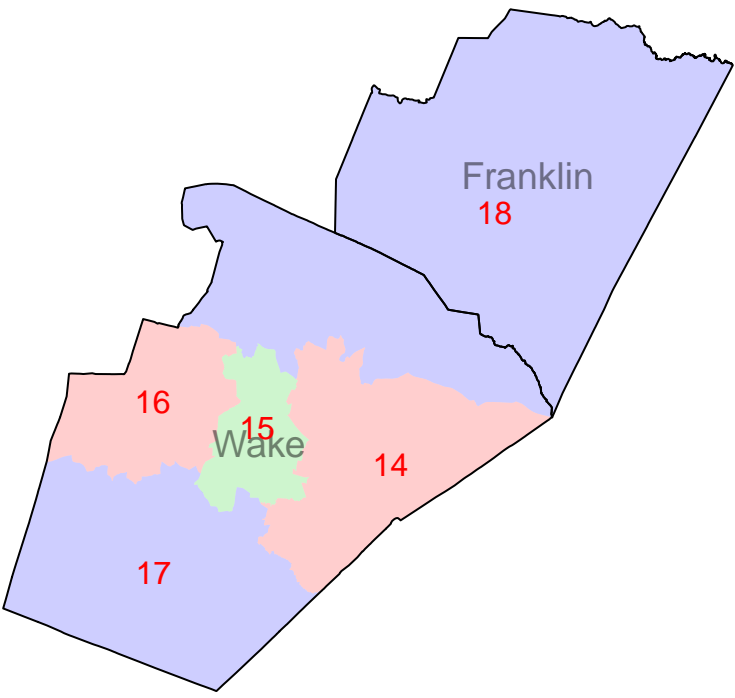
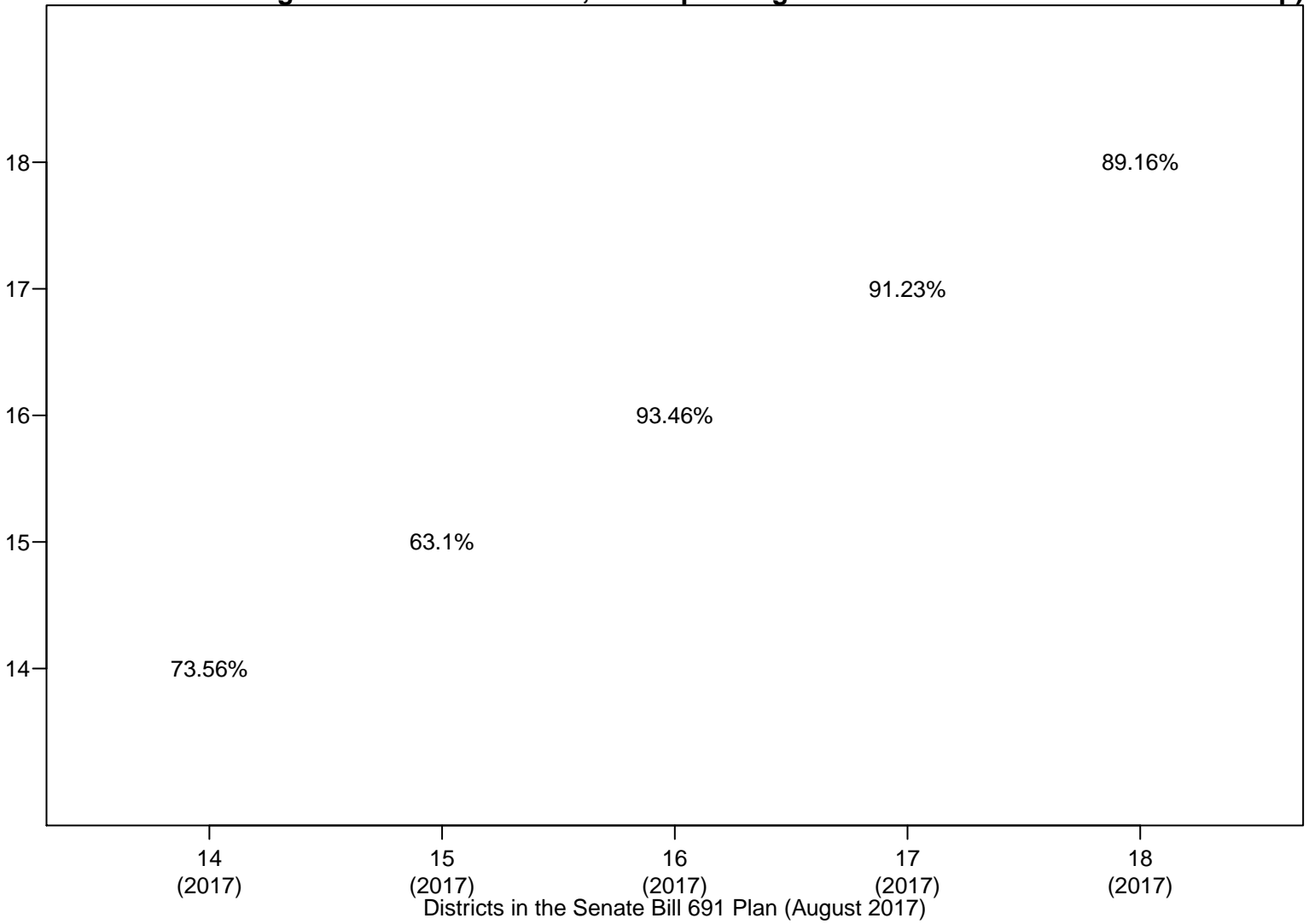
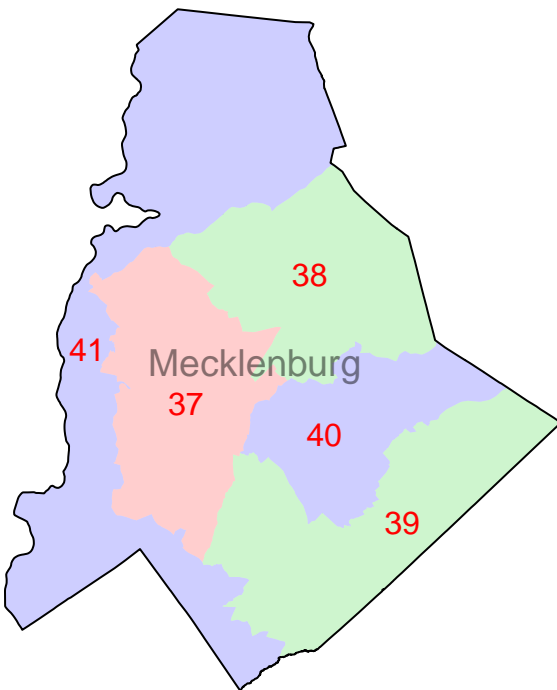
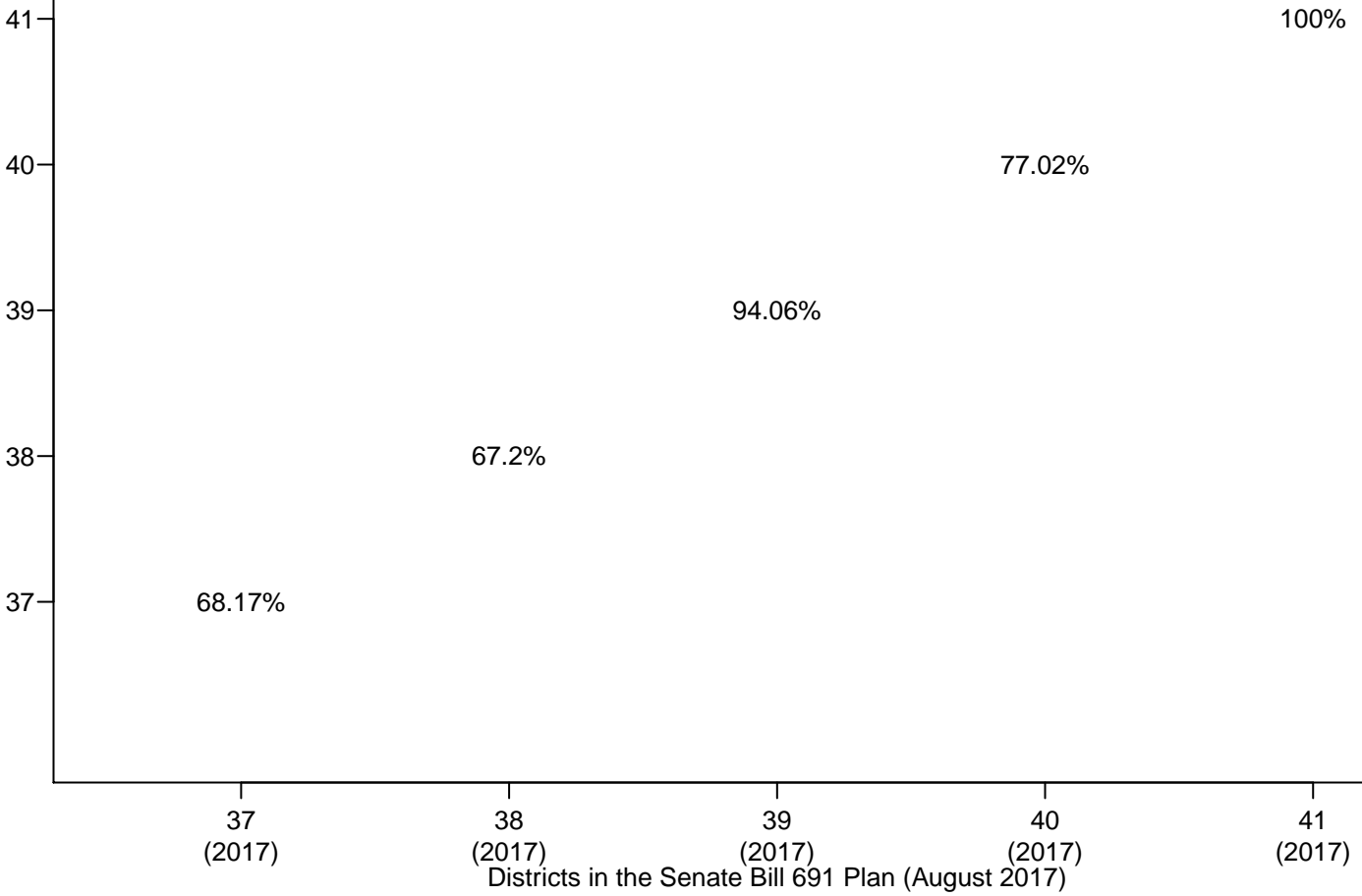


Figure 24

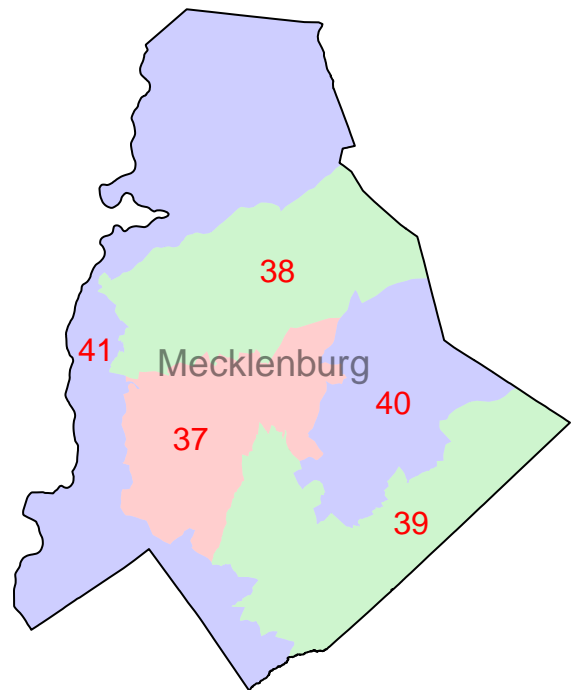
Mecklenburg County Grouping

(Numbers indicate the percentage of population in each of Dr. Hofeller's draft 'J_24' districts that was also assigned to its most similar, corresponding district in the final Senate Bill 691 map)

Districts in Dr. Hofeller's 'SENATE_J_24_20170624' Map



SENATE_J_24_20170624.shp (Hofeller)



Senate Bill 691 Plan (5 Districts)

Figure 26: Screenshot of Dataview Window For Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017)

Maptitude for Redistricting (Licensed to FrontWater geo)

File Edit Dataview Selection Tools Redistricting Window Help

All Records

Dataview1 - Districts in Plan (120): Maximum (120)

District	Population	Deviation	Members	[% Deviation]	[% NH18+_Wht]	[% 18+_AP_Blk]	[% H18+_Pop]	[% 18+_Ind]
107	0	-79,462	1.0	-100%	17.25%	68.95%	9.02%	0.53%
27	2	-79,460	1.0	-100%	41.54%	53.71%	1.53%	2.71%
23	0	-79,462	1.0	-100%	44.85%	51.83%	2.78%	0.3%
31	2	-79,460	1.0	-100%	32.17%	50.87%	12.72%	0.55%
32	3	-79,459	1.0	-100%	44.97%	49.12%	4.13%	1.44%
43	2	-79,460	1.0	-100%	36.19%	48.97%	10.4%	0.87%
72	3	-79,459	1.0	-100%	38.97%	46.63%	12.79%	0.47%
42	0	-79,462	1.0	-100%	41.35%	46.6%	8.68%	1.01%
58	2	-79,460	1.0	-100%	43.49%	46.22%	6.47%	0.48%
99	0	-79,462	1.0	-100%	32.34%	46.19%	17.55%	0.56%
8	2	-79,460	1.0	-100%	48.2%	44.91%	4.65%	0.33%
57	1	-79,461	1.0	-100%	49.11%	44.5%	3.85%	0.46%
5	0	-79,462	1.0	-100%	51.26%	44.32%	2.75%	0.64%
39	0	-79,462	1.0	-100%	40.85%	44.2%	13.17%	0.62%
59	2	-79,460	1.0	-100%	40.64%	42.33%	10.59%	0.73%
38	3	-79,459	1.0	-100%	37.61%	42.25%	15.37%	0.59%
101	3	-79,459	1.0	-100%	46.35%	42.02%	7.78%	0.52%
21	3	-79,459	1.0	-100%	46.53%	41.9%	9.68%	0.64%
71	2	-79,460	1.0	-100%	44.82%	40.56%	13.2%	0.41%
1	1	-79,461	1.0	-100%	57.23%	39.71%	1.93%	0.32%
33	2	-79,460	1.0	-100%	45.7%	39.34%	9.77%	0.51%
92	1	-79,461	1.0	-100%	41.32%	38.67%	15.3%	0.55%
102	2	-79,460	1.0	-100%	43.38%	38.43%	14.32%	0.52%
24	3	-79,459	1.0	-100%	53.16%	38.11%	7.6%	0.28%
60	1	-79,461	1.0	-100%	49.41%	37.05%	7.46%	0.62%
12	1	-79,461	1.0	-100%	57.25%	36.6%	5.2%	0.41%
48	1	-79,461	1.0	-100%	46.39%	36.13%	6.42%	9.48%
7	1	-79,461	1.0	-100%	57.9%	35.83%	5.14%	0.61%
106	1	-79,461	1.0	-100%	48.31%	34.97%	7.37%	0.37%
29	1	-79,461	1.0	-100%	46.96%	32.71%	12.6%	0.47%
30	4	-79,458	1.0	-99.99%	54.09%	32.35%	10.2%	0.39%
100	1	-79,461	1.0	-100%	47.76%	32.17%	16.18%	0.61%
25	2	-79,460	1.0	-100%	62.61%	30.25%	5.64%	0.62%
88	2	-79,460	1.0	-100%	46.13%	29.82%	17.86%	0.48%
18	0	-79,462	1.0	-100%	63.5%	29.24%	5.35%	0.75%
22	0	-79,462	1.0	-100%	59.22%	28.56%	9.7%	2.1%
2	0	-79,462	1.0	-100%	65.76%	27.79%	5.28%	0.67%
45	2	-79,460	1.0	-100%	63.53%	26.76%	5.02%	2.95%
46	3	-79,459	1.0	-100%	56.41%	26.51%	5.79%	10.05%
44	3	-79,459	1.0	-100%	60.72%	25.99%	7.98%	1.72%
79	2	-79,460	1.0	-100%	68.1%	25.67%	5.02%	0.45%
47	0	-79,462	1.0	-100%	16.27%	25.13%	6.18%	51.56%
66	0	-79,462	1.0	-100%	66.72%	24.24%	6.12%	1.46%
55	3	-79,459	1.0	-100%	70.64%	24.12%	3.9%	0.46%
4	2	-79,460	1.0	-100%	62.97%	22.59%	13.39%	0.49%
16	1	-79,461	1.0	-100%	70.46%	22.04%	4.69%	2.01%

Figure 27:
Screenshot of "Formula" Window and District Labels For Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017)

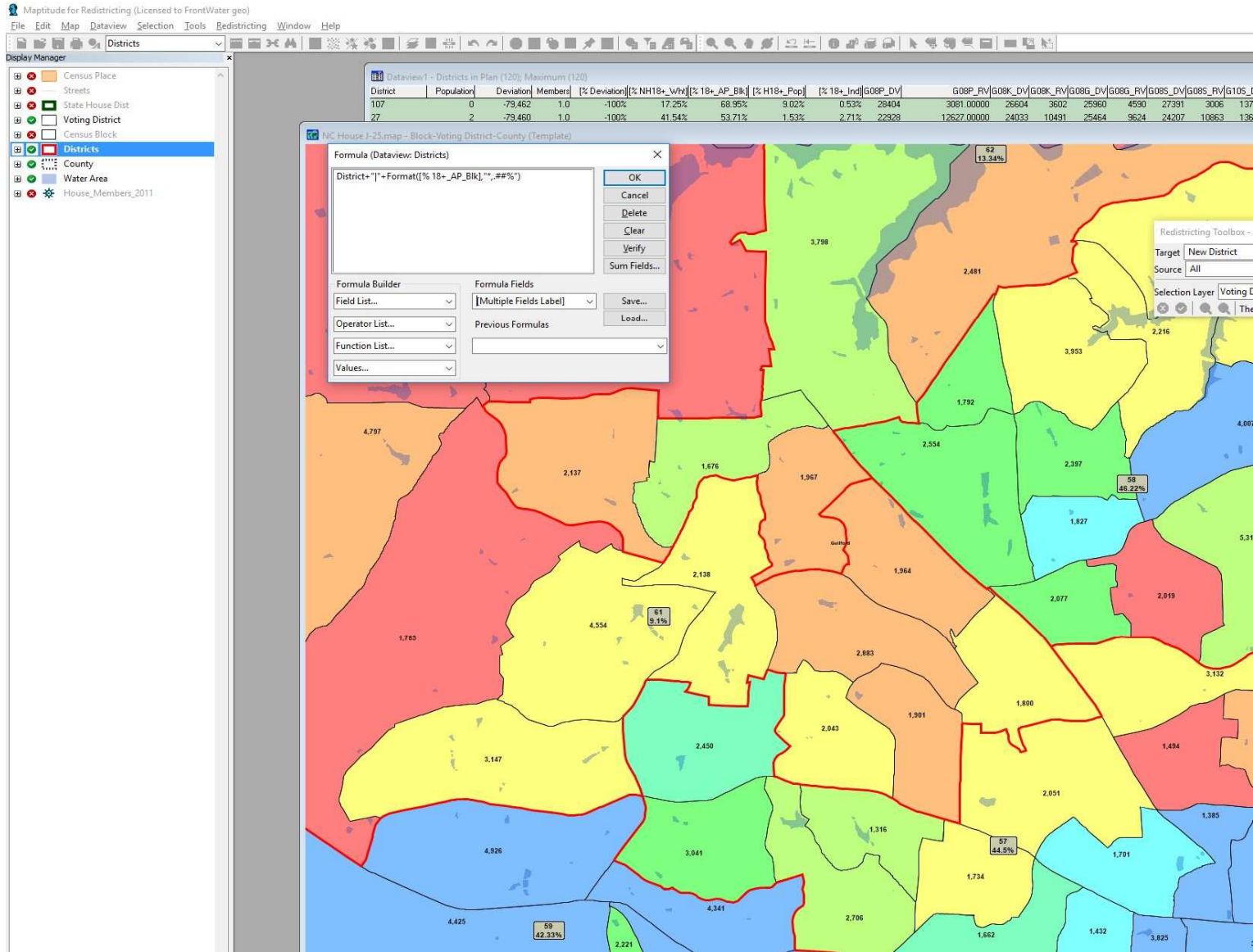


Figure 28:
Screenshot of District Labels Reporting Racial Characteristics of Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017)

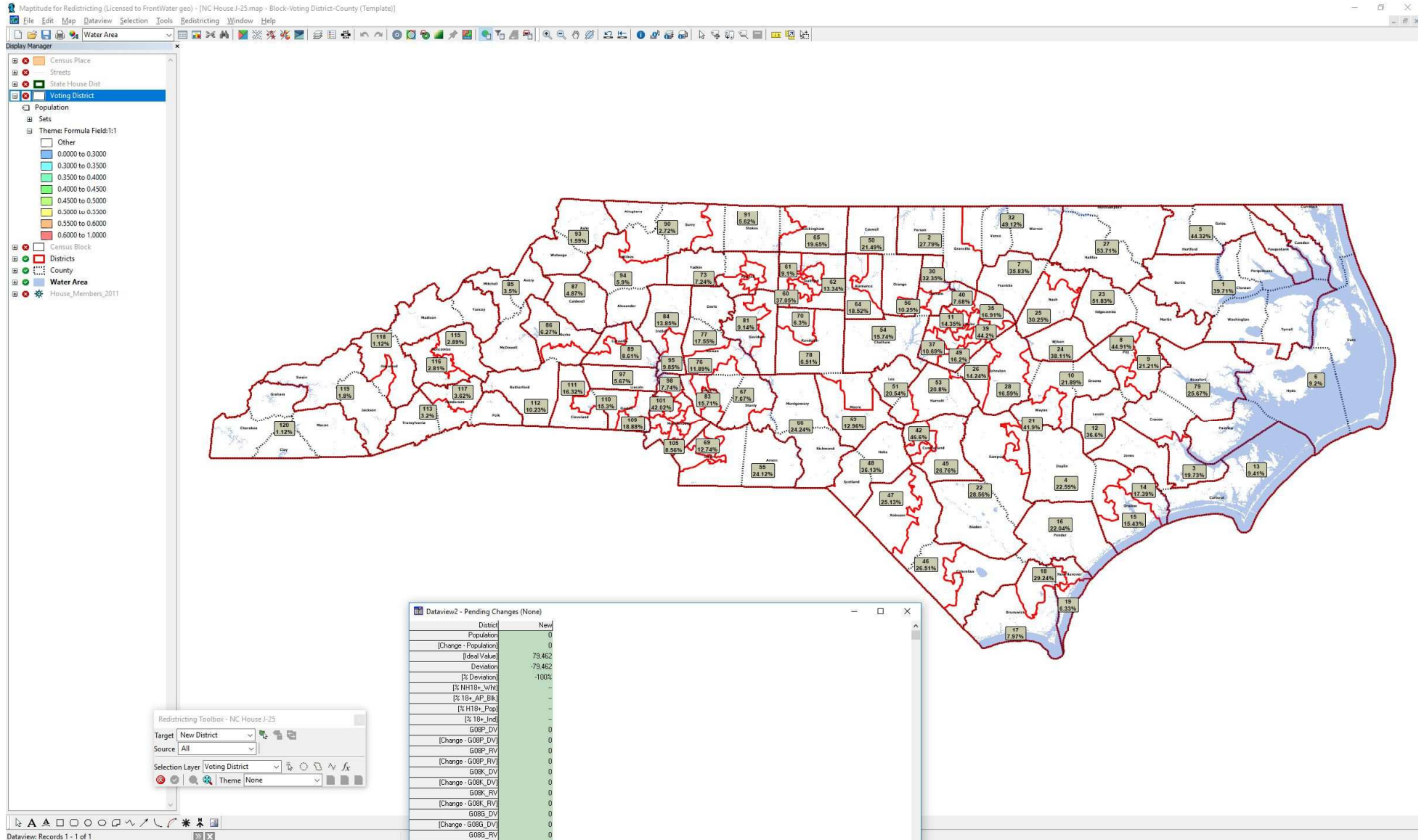


Figure 29:

Screenshot of Dataview Window For Dr. Hofeller's "NC Senate J-23005.bak.zip" Draft Plan (August 13, 2017)

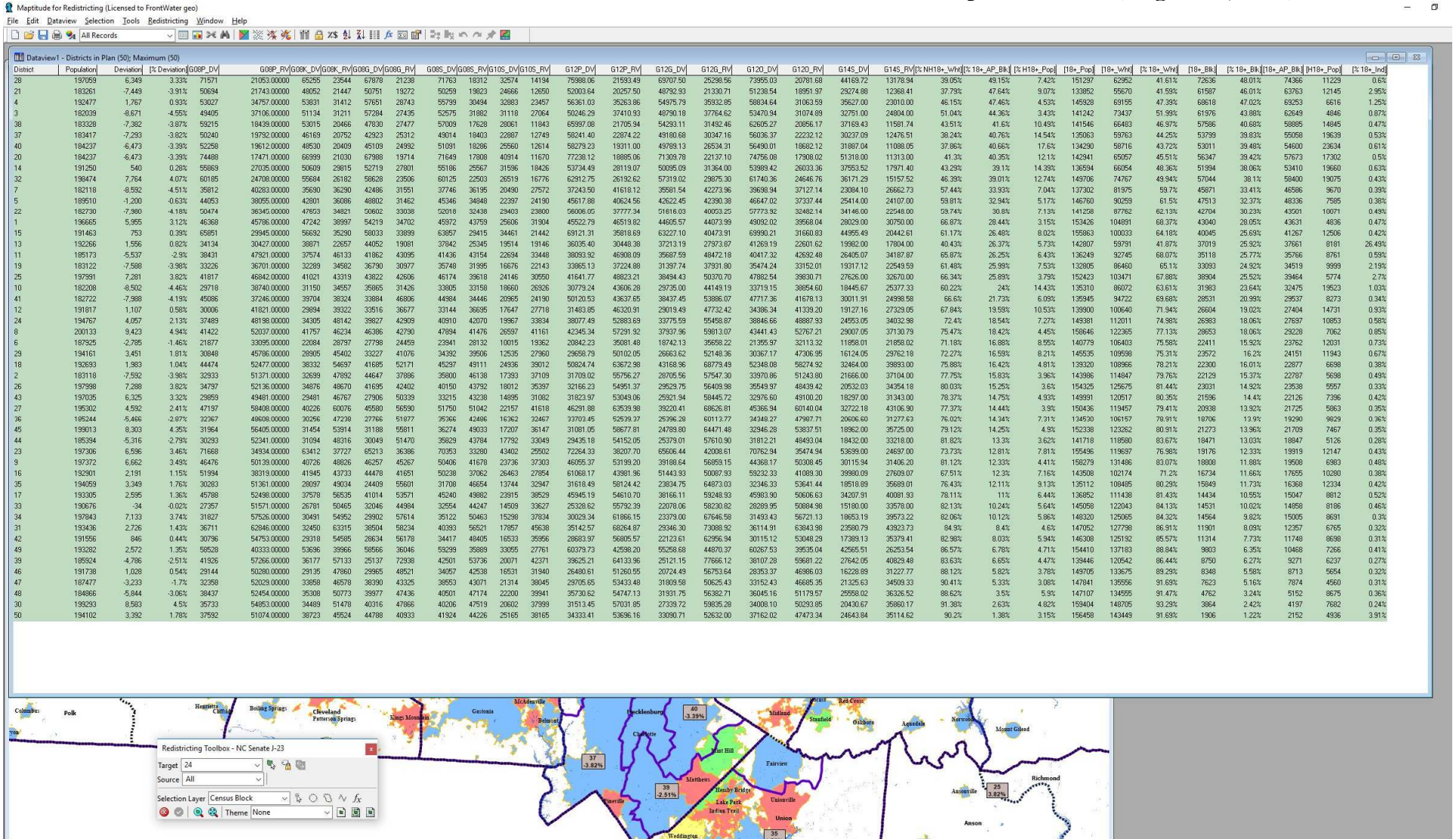


Figure 30:

Dr. Hofeller's "FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS.doc"

**FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS
USING 2-PARTY VOTE**

$$\frac{(G08P_RV+G08G_RV+G08S_RV+G08K_RV+G12P_RV+G12G_RV+G12O_RV+G10S_RV+G14S_RV)}{(G08P_DV+G08P_RV+G08G_DV+G08G_RV+G08S_DV+G08S_RV+G08K_DV+G08K_RV+G12P_DV+G12P_RV+G12G_DV+G12G_RV+G12O_DV+G12O_RV+G10S_DV+G10S_RV+G14S_DV+G14S_RV)}$$

2008 President
2008 Governor
2008 U. S. Senate
2008 insurance Commissioner
2010 U. S. Senate
2012 President
2012 Governor
2012 Commissioner of Labor
2014 U. S. Senate

Note: The full filepath location of this file is:

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Redistricting\FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE
DISTRICTS.docx"

Figure 32:

Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (December 6, 2016)

New 2016 House Plan - December 5									
Group Type	Dist	Avg R	Off Year	Incumbent	Pty	Note	Old Avg.	New - Old Avg	
New	1	44.49%	50.90%	Steinburg	R	##	56.77%	-12.28%	
Gra-Per-Van-War	2	52.41%	55.17%	Yarborough	R		51.84%	0.57%	
New	3	59.57%	65.68%	Speciale	R		56.36%	3.21%	
New	4	55.22%	60.24%	Dixon	R		61.60%	-6.38%	
New	5	37.17%	42.20%	Hunter	D				
New	6	57.79%	62.46%	Boswell	R		54.96%	2.83%	
Fran-Nash	7	43.21%	45.77%	Richardson	D	##	38.61%	4.60%	
New	8	34.79%	37.03%	Vacant	D	#			
New	9	54.96%	59.58%	Murphy	R		53.89%	1.07%	
New	10	62.11%	66.57%	Bell	R		62.82%	-0.71%	
Wake	11	40.34%	39.63%	Hall/Ball	D-D	#			
New	12	47.60%	51.58%	Graham	D		40.79%	6.81%	
Old	13	64.27%	68.75%	McElraft	R		64.27%	0.00%	
Old	14	58.00%	64.58%	Cleveland	R		58.00%	0.00%	
Old	15	60.31%	67.14%	Shepard	R		60.31%	0.00%	
New	16	52.95%	57.51%	Millis	R		59.57%	-6.62%	
Old	17	60.83%	64.70%	Iler	R		60.83%	0.00%	
Old	18	37.12%	39.63%	Hamilton	D				
Old	19	58.04%	60.71%	Davis	R		58.04%	0.00%	
Old	20	58.55%	61.15%	Grange	R		58.55%	0.00%	
New	21	38.92%	42.84%	Bell	D				
New	22	54.03%	57.09%	Brison	D	##	52.47%	1.56%	
Old	23	34.23%	37.64%	Willingham	D				
New	24	45.20%	47.27%	Martin/Butterfield	R-D	#	53.20%	-8.00%	
Fran-Nash	25	54.99%	58.12%	Collins	R	##	59.22%	-4.23%	
New	26	62.42%	65.30%	While	R		58.67%	3.75%	
Old	27	32.28%	36.27%	Wray	D				
New	28	60.67%	64.85%	Strickland	R		52.47%	8.20%	
New	29	15.07%	14.99%	Hall	D				
New	30	34.76%	34.44%	Lehman	D				
New	31	22.26%	21.17%	Michaux	D				
Gra-Per-Van-War	32	33.08%	36.55%	Garrison	D				
Wake	33	20.83%	17.84%	Gill	D				
Wake	34	45.21%	46.34%	Martin	D		37.99%	7.22%	
Wake	35	55.97%	58.19%	Malone	R		54.92%	1.05%	
Wake	36	53.02%	53.44%	Dollar	R		54.94%	-1.92%	
Wake	37	53.64%	55.11%	Williams	R		56.45%	-2.81%	
Wake	38	28.48%	28.51%	Holley	D				
Wake	39	32.72%	32.10%	Jackson	D				
Wake	40	57.05%	58.19%	John	D	##	54.63%	2.42%	
Wake	41	45.86%	45.97%	Adcock	D		50.53%	-4.67%	
Cumb	42	32.06%	34.49%	Lucas	D				
Cumb	43	35.73%	41.88%	Flower	D				

Full filepath: "ES0007C\C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-
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Minimum-Partisan-Members D.xlsx"

Figure 33:

Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members.xlsx" (December 3, 2016)

	Group Type	Dist	Avg R	Off Year	Incumbent	Pty	Note	Old Avg	New - Old Avg
3	New	1	44.49%	50.90%	Steinburg	R	##	56.77%	-12.28%
4	Gra-Per-Van-War	2	52.41%	55.17%	Yarborough	R		51.84%	0.57%
5	New	3	54.37%	61.02%	Speciale	R		56.36%	-1.99%
6	New	4	54.77%	59.69%	Dixon	R		61.60%	-6.83%
7	New	5	37.17%	42.20%	Hunter	D			
8	New	6	57.79%	62.46%	Boswell	R		54.96%	2.83%
9	Fran-Nash	7	51.17%	56.15%	Richardson	D	##	38.61%	12.56%
10	New	8	35.06%	37.15%	Vacant	D	#		
11	New	9	53.40%	57.78%	Murphy	R		53.89%	-0.49%
12	New	10	62.11%	66.57%	Bell	R		62.82%	-0.71%
13	Wake	11	40.34%	39.63%	Hall/Ball	D-D	#		
14	New	12	48.98%	53.19%	Graham	D		40.79%	8.19%
15	Old	13	64.27%	68.75%	McElraft	R		64.27%	0.00%
16	Old	14	58.00%	64.41%	Cleveland	R		58.00%	0.00%
17	Old	15	60.31%	67.92%	Shepard	R		60.31%	0.00%
18	New	16	53.53%	58.08%	Millis	R		59.57%	-6.04%
19	Old	17	60.83%	64.70%	Iler	R		60.83%	0.00%
20	Old	18	37.12%	39.63%	Hamilton	D			
21	Old	19	58.04%	60.71%	Davis	R		58.04%	0.00%
22	Old	20	58.55%	61.15%	Grange	R		58.55%	0.00%
23	New	21	38.93%	42.84%	Bell	D			
24	New	22	54.02%	57.09%	Brison	D	##	52.47%	1.55%
25	Old	23	34.23%	37.64%	Willingham	D			
26	New	24	45.20%	47.27%	Martin/Butterfield	R-D	#	53.20%	-8.00%
27	Fran-Nash	25	47.17%	48.30%	Collins	R	##	59.22%	-12.05%
28	New	26	62.42%	65.30%	While	R		58.67%	3.75%
29	Old	27	32.28%	36.27%	Wray	D			
30	New	28	60.67%	64.85%	Strickland	R		52.47%	8.20%
31	New	29	11.36%	14.99%	Hall	D			
32	New	30	37.17%	34.44%	Lehman	D			
33	New	31	23.18%	21.17%	Michaux	D			
34	Gra-Per-Van-War	32	33.08%	36.55%	Garrison	D			
35	Wake	33	20.83%	17.84%	Gill	D			
36	Wake	34	45.21%	46.34%	Martin	D		37.99%	7.22%
37	Wake	35	55.97%	58.19%	Malone	R		54.92%	1.05%
38	Wake	36	53.08%	53.44%	Dollar	R		54.94%	-1.86%
39	Wake	37	53.63%	55.11%	Williams	R		56.45%	-2.82%
40	Wake	38	28.48%	28.51%	Holley	D			
41	Wake	39	32.72%	32.10%	Jackson	D			
42	Wake	40	57.05%	58.19%	John	D	##	54.63%	2.42%
43	Wake	41	45.85%	45.97%	Adcock	D		50.53%	-4.68%
44	Cumb	42	32.49%	34.61%	Lucas	D			
45	Cumb	43	38.13%	42.01%	Cloud	D			

Full filepath: ES0007C\C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-
ea77894bb5b2\20161201_112948_toshibaInc1350\C\Users\toshiba\Documents\Tom\2017 Redistricting\ House
Minimum-Partisan-Members.xlsx

Figure 36:
Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (June 12, 2017)

New 2016 House Plan - June 12								
Group Type	Dist	Avg R	Off Year	Incumbent	Pty	Note	Old Avg.	New - Old Avg
New	1	44.49%	50.90%	Steinburg	R	##	56.77%	-12.28%
Gra-Per-Van-War	2	52.41%	55.17%	Yarborough	R		51.84%	0.57%
New	3	59.57%	65.68%	Speciale	R		56.36%	3.21%
New	4	55.22%	60.24%	Dixon	R		61.60%	-6.38%
New	5	37.17%	42.20%	Hunter	D			
New	6	57.79%	62.46%	Boswell	R		54.96%	2.83%
Fran-Nash	7	43.21%	45.77%	Richardson	D	##	38.61%	4.60%
New	8	34.79%	37.03%	Vacant	D	#		
New	9	54.96%	59.58%	Murphy	R		53.89%	1.07%
New	10	64.66%	69.67%	Bell	R		62.82%	1.84%
Wake	11	40.34%	39.63%	Hall/Ball	D-D	#		
New	12	47.60%	51.58%	Graham	D		40.79%	6.81%
Old	13	64.27%	68.75%	McElraft	R		64.27%	0.00%
Old	14	58.00%	64.58%	Cleveland	R		58.00%	0.00%
Old	15	60.31%	67.14%	Shepard	R		60.31%	0.00%
New	16	52.95%	57.51%	Millis	R		59.57%	-6.62%
Old	17	60.83%	64.70%	Iler	R		60.83%	0.00%
Old	18	37.12%	39.63%	Hamilton	D			
Old	19	58.04%	60.71%	Davis	R		58.04%	0.00%
Old	20	58.55%	61.15%	Grange	R		58.55%	0.00%
New	21	44.04%	47.83%	Bell	D			
New	22	44.04%	47.83%	Brisson	D		52.47%	-8.43%
Old	23	34.23%	37.64%	Willingham	D			
New	24	45.20%	47.27%	Martin/Butterfield	R-D	#	53.20%	-8.00%
Fran-Nash	25	54.99%	58.12%	Collins	R	##	59.22%	-4.23%
New	26	62.42%	65.30%	While	R		58.67%	3.75%
Old	27	32.28%	36.27%	Wray	D			
New	28	60.67%	64.85%	Strickland	R		52.47%	8.20%
New	29	15.07%	14.99%	Hall	D			
New	30	34.76%	34.44%	Lehman	D			
New	31	22.26%	21.17%	Michaux	D			
Gra-Per-Van-War	32	33.08%	36.55%	Garrison	D			
Wake	33	20.83%	17.84%	Gill	D			
Wake	34	45.21%	46.34%	Martin	D		37.99%	7.22%
Wake	35	55.97%	58.19%	Malone	R		54.92%	1.05%
Wake	36	53.02%	53.44%	Dollar	R		54.94%	-1.92%
Wake	37	53.64%	55.11%	Williams	R		56.45%	-2.81%
Wake	38	28.48%	28.51%	Holley	D			
Wake	39	32.72%	32.10%	Jackson	D			
Wake	40	57.05%	58.19%	John	D	##	54.63%	2.42%
Wake	41	45.86%	45.97%	Adcock	D		50.53%	-4.67%
Cumb	42	32.06%	34.49%	Lucas	D			
Cumb	43	26.72%	41.98%	Flour	D			

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 ea77894bb5b2\20170612_230105_toshibaInc2436\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\
 House Minimum-Partisan-Members D.xlsx

Figure 39:
Dr. Hofeller's Draft Plan File: "NC Senate Minimum Partisan J-2" (June 13, 2017)

Group Type	Dist	Avg R	14 Sen%	Incumbent	Pty	Note	Old Ave R	11 ti 17
New	1	47.94%	52.31%	Cook	R		53.54%	-5.60%
Old	2	60.16%	63.13%	Sanderson	R		60.16%	0.00%
New	3	40.10%	43.10%	Smith-Ingram	D		34.18%	5.93%
New	4	37.39%	39.24%	Horner	R	##	31.88%	5.51%
New	5	45.94%	48.68%	Davis	D		36.80%	9.15%
Old	6	59.16%	64.83%	Brown	R		59.16%	0.00%
New	7	50.94%	53.60%	Pate	R		59.37%	-8.43%
Old	8	54.69%	56.14%	Rabon	R		54.69%	0.00%
Old	9	53.05%	51.05%	Lee	R		53.05%	0.00%
New	10	54.75%	57.91%	Jackson	R		57.13%	-2.38%
New	11	54.47%	56.42%	Bryant	D	##	57.61%	-3.13%
New	12	57.19%	58.83%	Rabin	R		57.19%	0.00%
Old	13	41.09%	47.12%	Britt	R	##	41.09%	0.00%
Wake-Franklin	14	25.37%	22.89%	Blue	D		25.54%	-0.17%
Wake-Franklin	15	53.04%	49.97%	Alexander	R		53.32%	-0.28%
Wake-Franklin	16	39.77%	35.22%	Chaudhuri	D		38.80%	0.97%
Wake-Franklin	17	54.36%	51.52%	Barringer	R		53.45%	0.91%
Wake-Franklin	18	52.57%	53.26%	Barefoot	R		52.76%	-0.19%
Cumberland	19	50.79%	53.27%	Meredith	R		49.30%	1.48%
New	20	20.93%	18.06%	McKissick	D		24.15%	-3.23%
Cumberland	21	29.52%	29.98%	Clark	D		30.53%	-1.01%
New	22	40.57%	39.77%	Woodard	D		37.71%	2.86%
Old	23	34.84%	31.50%	Foushee	D		34.84%	0.00%
New	24	56.91%	58.10%	Gunn	R		59.06%	-2.14%
New	25	51.51%	54.18%	McInnis	R		55.19%	-3.68%
New	26	59.18%	62.59%	Berger	R		57.51%	1.67%
New	27	57.95%	56.89%	Wade	R		55.06%	2.90%
New	28	22.97%	22.18%	Robinson	D		18.65%	4.32%
New	29	60.90%	64.77%	Tillman	R		67.04%	-6.14%
New	30	60.87%	63.71%	Randleman, Ballard	R,R	#	66.15%	-5.28%
New	31	64.87%	65.07%	Brock, Krawiec	R,R	#	62.71%	2.16%
New	32	30.42%	29.53%	Lowe	D		31.20%	-0.78%
Old	33	65.39%	68.87%	Dunn	R		65.39%	0.00%
New	34	66.29%	67.96%	Vacant	R	#	63.53%	2.76%
Old	35	65.63%	65.84%	Tucker	R		65.36%	0.27%
Old	36	61.81%	60.28%	Newton	R		62.18%	-0.38%
Mecklenburg	37	31.35%	29.21%	Vacant	D	#	37.87%	-6.52%
Mecklenburg	38	28.06%	23.76%	Jackson	D		23.36%	4.70%
Mecklenburg	39	63.96%	59.63%	Bishop	R		61.93%	2.03%
Mecklenburg	40	29.05%	25.80%	Waddell	D		20.96%	8.09%
Mecklenburg	41	49.59%	45.44%	Ford, Tarte	D,R	###	57.53%	-7.94%
Old	42	65.81%	67.05%	Wells	R		65.81%	0.00%
New	43	62.82%	63.14%	Jarromgtpm	R		62.82%	0.00%

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 Senate Minimu-Partisan J-2.xlsx.

Figure 40:
Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx" (June 14, 2017)

New 2016 House Plan - June 17-2								
Using 08 and 12 President Plus Other Statewide Races								
Group Type	Dist	Avg R	Off Year	Incumbent	Pty	Note	Old Avg.	New - Old Avg
New	1	44.49%	49.27%	Steinburg	R	##	56.77%	-12.28%
Gra-Per-Van-War	2	52.41%	54.23%	Yarborough	R		51.84%	0.57%
New	3	60.04%	63.52%	Speciale	R		56.36%	3.68%
New	4	55.22%	60.42%	Dixon	R		61.60%	-6.38%
New	5	37.17%	40.94%	Hunter	D		32.23%	
New	6	57.79%	60.48%	Boswell	R		54.96%	2.83%
Fran-Nash	7	43.21%	44.65%	Richardson	D		38.61%	4.60%
New	8	34.82%	35.83%	Vacant	D	#	53.20%	
New	9	54.66%	57.45%	Murphy	R		53.89%	0.77%
New	10	55.52%	59.45%	Vacant	R		62.82%	-7.30%
Wake	11	40.34%	35.32%	Hall/Ball	D-D	#	39.02%	
New	12	47.66%	49.85%	Graham	D		40.79%	6.88%
Old	13	64.27%	66.75%	McElraft	R		64.27%	0.00%
Old	14	58.00%	63.85%	Cleveland	R		58.00%	0.00%
Old	15	60.31%	66.50%	Shepard	R		60.31%	0.00%
New	16	53.01%	55.35%	Millis	R		59.57%	-6.56%
Old	17	60.83%	61.69%	Iler	R		60.83%	0.00%
Old	18	37.12%	35.75%	Hamilton	D		37.12%	
Old	19	58.04%	55.14%	Davis	R		58.04%	0.00%
Old	20	58.55%	56.63%	Grange	R		58.55%	0.00%
New	21	54.71%	57.18%	Bell	D	##	34.18%	20.52%
New	22	45.15%	47.83%	Brison/Bell	D-D		52.47%	-7.32%
Old	23	34.23%	35.95%	Willingham	D		34.23%	
New	24	45.20%	46.85%	Martin/Butterfield	R-D	#	27.25%	17.95%
Fran-Nash	25	54.99%	57.48%	Collins	R	##	59.22%	-4.23%
New	26	62.42%	63.41%	White	R		58.67%	3.75%
Old	27	32.28%	35.04%	Wray	D		32.28%	
New	28	60.67%	63.28%	Strickland	R		64.55%	-3.88%
New	29	21.23%	17.64%	Hall	D		14.84%	
New	30	31.91%	29.02%	Lehman	D		30.09%	
New	31	19.37%	17.54%	Michaux	D		18.28%	
Gra-Per-Van-War	32	33.08%	34.86%	Garrison	D		33.37%	
Wake	33	20.83%	16.85%	Gill	D		19.72%	
Wake	34	45.21%	42.30%	Martin	D		37.99%	7.23%
Wake	35	56.07%	55.57%	Malone	R		54.94%	1.13%
Wake	36	53.02%	49.02%	Dollar	R		54.92%	-1.90%
Wake	37	53.64%	51.33%	Williams	R		56.45%	-2.81%
Wake	38	28.48%	26.13%	Holley	D		23.36%	
Wake	39	32.87%	30.60%	Jackson	D		44.88%	
Wake	40	57.09%	53.97%	John	D	##	54.63%	2.46%
Wake	41	45.86%	41.15%	Adcock	D		50.53%	-4.68%
Cumb	42	27.35%	26.64%	Lucas	D		27.32%	

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 ea77894bb5b2\20170615_103911_toshibaInc2461\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\
 House Minimum-Partisan-Members J-2.xlsx

Figure 49: Dr. Hofeller's Draft Plan File: "NC House CCNC Sample Plan - June 2017.xlsx" (July 5, 2017).

Full filepath: ES0007C\C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibaInc2731\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\ NC House CCNC Sample Plan - June 2017.xlsx

Figure 41:
Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx" (June 14, 2017)

Group Type	Dist	Avg R	Off Year	Incumbent	Pty	Note	Old Avg.	New - Old Avg.
New	1	44.49%	49.27%	Steinburg	R	##	56.77%	-12.28%
Gra-Per-Van-War	2	52.41%	54.23%	Yarborough	R		51.84%	0.57%
New	3	60.04%	63.52%	Speciale	R		56.36%	3.68%
New	4	55.22%	60.42%	Dixon	R		61.60%	-6.38%
New	5	37.17%	40.94%	Hunter	D		32.23%	
New	6	57.79%	60.48%	Boswell	R		54.96%	2.83%
Fran-Nash	7	43.21%	44.65%	Richardson	D		38.61%	4.60%
New	8	34.82%	35.83%	Vacant	D	#	53.20%	
New	9	54.66%	57.45%	Murphy	R		53.89%	0.77%
New	10	55.52%	59.45%	Vacant	R		62.82%	-7.30%
Wake	11	40.34%	35.32%	Hall/Ball	D-D	#	39.02%	
New	12	47.66%	49.85%	Graham	D		40.79%	6.88%
Old	13	64.27%	66.75%	McElraft	R		64.27%	0.00%
Old	14	58.00%	63.85%	Cleveland	R		58.00%	0.00%
Old	15	60.31%	66.50%	Shepard	R		60.31%	0.00%
New	16	53.01%	55.35%	Millis	R		59.57%	-6.56%
Old	17	60.83%	61.69%	Iler	R		60.83%	0.00%
Old	18	37.12%	35.75%	Hamilton	D		37.12%	
Old	19	58.04%	55.14%	Davis	R		58.04%	0.00%
Old	20	58.55%	56.63%	Grange	R		58.55%	0.00%
New	21	54.71%	57.18%	Bell	D	##	34.18%	20.52%
New	22	45.15%	47.83%	Brison/Bell	D-D		52.47%	-7.32%
Old	23	34.23%	35.95%	Willingham	D		34.23%	
New	24	45.20%	46.85%	Martin/Butterfield	R-D	#	27.25%	17.95%
Fran-Nash	25	54.99%	57.48%	Collins	R	##	59.22%	-4.23%
New	26	62.42%	63.41%	White	R		58.67%	3.75%
Old	27	32.28%	35.04%	Wray	D		32.28%	
New	28	60.67%	63.28%	Strickland	R		64.55%	-3.88%
New	29	21.23%	17.64%	Hall	D		14.84%	
New	30	31.91%	29.02%	Lehman	D		30.09%	
New	31	19.37%	17.54%	Michaux	D		18.28%	
Gra-Per-Van-War	32	33.08%	34.86%	Garrison	D		33.37%	
Wake	33	20.83%	16.85%	Gill	D		19.72%	
Wake	34	45.21%	42.30%	Martin	D		37.99%	7.23%
Wake	35	56.07%	55.57%	Malone	R		54.94%	1.13%
Wake	36	53.02%	49.02%	Dollar	R		54.92%	-1.90%
Wake	37	53.64%	51.33%	Williams	R		56.45%	-2.81%
Wake	38	28.48%	26.13%	Holley	D		23.36%	
Wake	39	32.87%	30.60%	Jackson	D		44.88%	
Wake	40	57.09%	53.97%	John	D	##	54.63%	2.46%
Wake	41	45.86%	41.15%	Adcock	D		50.53%	-4.68%
Cumb	42	27.35%	26.64%	Lucas	D		27.32%	

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Figure 42:
Dr. Hofeller's Draft Plan File: "NC Senate Minimum-Partisan J-2.xlsx" (June 13, 2017)

New 2016 Senate Plan								
Group Type	Dist	Avg R	14 Sen%	Incumbent	Pty	Note	Old Ave R	11 ti 17
New	1	52.70%		Cook	R			
Old	2	60.16%		Sanderson	R			
New	3	35.11%		Smith-Ingram	D			
New	4	37.39%		Horner	R	##		
New	5	45.94%		Davis	D			
Old	6	59.16%		Brown	R			
New	7	50.94%		Pate	R			
Old	8	54.69%		Rabon	R			
Old	9	53.05%		Lee	R			
New	10	55.32%		Jackson	R			
New	11	54.35%		Bryant	D	##		
New	12	56.83%		Rabin	R			
Old	13	41.09%		Britt	R	##		
Wake-Franklin	14	24.66%		Blue	D			
Wake-Franklin	15	52.46%		Alexander	R			
Wake-Franklin	16	40.50%		Chaudhuri	D			
Wake-Franklin	17	54.36%		Barringer	R			
Wake-Franklin	18	52.70%		Barefoot	R			
Cumberland	19	50.64%		Meredith	R			
New	20	27.50%		McKissick	D			
Cumberland	21	29.64%		Clark	D			
New	22	33.39%		Woodard	D			
Old	23	34.84%		Foushee	D			
New	24	56.91%		Gunn	R			
New	25	51.51%		McInnis	R			
New	26	59.18%		Berger	R			
New	27	58.05%		Wade	R			
New	28	23.67%		Robinson	D			
New	29	60.90%		Tillman	R			
New	30	60.87%		Randleman,Ballard	R,R	#		
New	31	64.87%		Brock, Krawiec	R,R	#		
New	32	30.42%		Lowe	D			
Old	33	65.39%		Dunn	R			
New	34	66.29%		Vacant	R	#		
Old	35	65.63%		Tucker	R			
Old	36	61.81%		Newton	R			
Mecklenburg	37	32.84%		Vacant	D	#		
Mecklenburg	38	26.55%		Jackson	D			
Mecklenburg	39	63.97%		Bishop	R			
Mecklenburg	40	28.50%		Waddell	D			
Mecklenburg	41	49.66%		Ford, Tarte	D,R	###		
Old	42	65.81%		Wells	R			
New	43	62.82%		Jarromgtpm	R			

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 ea77894bb5b2\20170613_104847_toshibaInc2443\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\
 Senate Minimum-Partisan-Members J-2.xlsx

Figure 43:
Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Members.xlsx" (November 26, 2016)

	Group Type	Dist	Avg R	Incumbent	Pty	Note	Old Ave R
3							
4	New	1	52.70%	Cook	R		
5	Old	2	60.16%	Sanderson	R		
6	New	3	35.11%	Smith-Ingram	D		
7	New	4	37.39%	Horner	R	##	
8	New	5	45.94%	Davis	D		
9	Old	6	59.16%	Brown	R		
10	New	7	50.94%	Pate	R		
11	Old	8	54.69%	Rabon	R		
12	Old	9	53.05%	Lee	R		
13	New	10	55.32%	Jackson	R		
14	New	11	54.35%	Bryant	D	##	
15	New	12	56.83%	Rabin	R		
16	Old	13	41.09%	Britt	R	##	
17	Wake-Franklin	14	24.66%	Blue	D		
18	Wake-Franklin	15	52.46%	Alexander	R		
19	Wake-Franklin	16	40.50%	Chaudhuri	D		
20	Wake-Franklin	17	54.36%	Barringer	R		
21	Wake-Franklin	18	52.70%	Barefoot	R		
22	Cumberland	19	50.64%	Meredith	R		
23	New	20	27.50%	McKissick	D		
24	Cumberland	21	29.64%	Clark	D		
25	New	22	33.39%	Woodard	D		
26	Old	23	34.84%	Foushee	D		
27	New	24	56.91%	Gunn	R		
28	New	25	51.51%	McInnis	R		
29	New	26	59.18%	Berger	R		
30	New	27	58.05%	Wade	R		
31	New	28	23.67%	Robinson	D		
32	New	29	60.90%	Tillman	R		
33	New	30	60.87%	Randleman, Ballard	R,R	#	
34	New	31	64.87%	Brock, Krawiec	R,R	#	
35	New	32	30.42%	Lowe	D		
36	Old	33	65.39%	Dunn	R		
37	New	34	66.29%	Vacant	R	#	
38	Old	35	65.63%	Tucker	R		
39	Old	36	61.81%	Newton	R		
40	Mecklenburg	37	32.84%	Vacant	D	#	
41	Mecklenburg	38	26.55%	Jackson	D		
42	Mecklenburg	39	63.97%	Bishop	R		
43	Mecklenburg	40	28.50%	Waddell	D		
44	Mecklenburg	41	49.66%	Ford, Tarte	D,R	###	
45	Old	42	65.81%	Wells	R		
46	New	43	62.82%	Jarromgtpm	R		

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 Senate Minimum-Partisan-Members.xlsx

Figure 44:

Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Members J-2.xlsx " (June 13, 2017)

New 2016 Senate Plan								
Group Type	Dist	Avg R	14 Sen%	Incumbent	Pty	Note	Old Ave R	11 ti 17
New	1	52.70%		Cook	R			
Old	2	60.16%		Sanderson	R			
New	3	35.11%		Smith-Ingram	D			
New	4	37.39%		Horner	R	##		
New	5	45.94%		Davis	D			
Old	6	59.16%		Brown	R			
New	7	50.94%		Pate	R			
Old	8	54.69%		Rabon	R			
Old	9	53.05%		Lee	R			
New	10	55.32%		Jackson	R			
New	11	54.35%		Bryant	D	##		
New	12	56.83%		Rabin	R			
Old	13	41.09%		Britt	R	##		
Wake-Franklin	14	24.66%		Blue	D			
Wake-Franklin	15	52.46%		Alexander	R			
Wake-Franklin	16	40.50%		Chaudhuri	D			
Wake-Franklin	17	54.36%		Barringer	R			
Wake-Franklin	18	52.70%		Barefoot	R			
Cumberland	19	50.64%		Meredith	R			
New	20	27.50%		McKissick	D			
Cumberland	21	29.64%		Clark	D			
New	22	33.39%		Woodard	D			
Old	23	34.84%		Foushee	D			
New	24	56.91%		Gunn	R			
New	25	51.51%		Mcinnis	R			
New	26	59.18%		Berger	R			
New	27	58.05%		Wade	R			
New	28	23.67%		Robinson	D			
New	29	60.90%		Tillman	R			
New	30	60.87%		Randleman,Ballard	R,R	#		
New	31	64.87%		Brock, Krawiec	R,R	#		
New	32	30.42%		Lowe	D			
Old	33	65.39%		Dunn	R			
New	34	66.29%		Vacant	R	#		
Old	35	65.63%		Tucker	R			
Old	36	61.81%		Newton	R			
Mecklenburg	37	32.84%		Vacant	D	#		
Mecklenburg	38	26.55%		Jackson	D			
Mecklenburg	39	63.97%		Bishop	R			
Mecklenburg	40	28.50%		Waddell	D			
Mecklenburg	41	49.66%		Ford, Tarte	D,R	###		
Old	42	65.81%		Wells	R			
New	43	62.82%		Jarrongtpm	R			

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ea77894bb5b2\20170615_103911_toshibaInc2461\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\
Senate Minimum-Partisan-Members J-2.xlsx

Figure 45:
Dr. Hofeller's Draft Plan File: "PPI Indicator Votes for New 2017 Legislative Districts.xlsx" (June 24, 2017).

Year	Office	Democrat	% 2 Party	Republican	% 2 Party	Lib.	Tot. 2-Pty	Rep. + Lib.	% R. + L.	TVCO	TVC	Rolloff
2010	U. S. Senate	1,145,074	43.99%	1,458,046	56.01%	55,687	2,603,120	1,513,733	56.93%	2,658,808	2,700,383	1.54%
2012	President	2,178,391	48.97%	2,270,395	51.03%	44,515	4,448,786	2,314,910	51.52%	4,493,302	4,542,488	1.08%
2012	Governor	1,931,580	44.18%	2,440,707	55.82%	94,652	4,372,287	2,535,359	56.76%	4,466,940	4,542,488	1.66%
2012	Lt. Governor	2,180,087	49.91%	2,187,728	50.09%	-	4,367,815	2,187,728	50.09%	4,367,816	4,542,488	3.85%
2014	U. S. Senate	1,377,651	49.19%	1,423,251	50.81%	109,100	2,800,902	1,532,351	52.66%	2,910,003	2,939,767	1.01%
2016	President	2,189,316	48.10%	2,362,631	51.90%	130,126	4,551,947	2,492,757	53.24%	4,682,074	4,769,640	1.84%
2016	U. S. Senate	2,128,165	47.05%	2,395,376	52.95%	167,592	4,523,541	2,562,968	54.63%	4,691,134	4,769,640	1.65%
2016	Governor	2,309,157	50.11%	2,298,880	49.89%	102,977	4,608,037	2,401,857	50.98%	4,711,015	4,769,640	1.23%
2016	Lt. Governor	2,093,375	46.66%	2,393,375	53.34%	132,641	4,486,750	2,526,016	54.68%	4,619,392	4,769,640	3.15%
2016	Atty. Gen.	2,303,619	50.27%	2,279,006	49.73%	-	4,582,625	2,279,006	49.73%	4,582,626	4,769,640	3.92%
All	All Votes	19,836,415		21,509,395		837,290	41,345,810	22,346,685		42,183,110	43,115,814	2.16%
All	Average Vt.	1,983,642	47.98%	2,150,940	52.02%	104,661	4,134,581	2,255,601	53.47%	4,218,311	4,311,581	2.16%

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 ea77894bb5b2\20170624_121146_toshibaInc2595\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\ PPI Indicator Votes for New 2017 Legislative Districts.xlsx

Figure 45b:
Dr. Hofeller's Draft Plan File: "House Minimum Renumbered.xls" (December 3, 2016).

The screenshot displays an Excel spreadsheet with the following structure:

- Row 1:** District
- Row 2:** Population, Deviation, Members, % Deviation, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z
- Row 3:** G08P_DV, G08P_RV, G08K_DV, G08K_RV, G08G_DV, G08G_RV, G08S_DV, G08S_RV, G08S_DV, G08S_RV, G10S_DV, G10S_RV, G12P_DV, G12P_RV, G12G_DV, G12G_RV, G12W_DV, G12W_RV, G14S_DV, G14S_RV

The data rows (rows 4-48) contain numerical values for each of these categories. For example, District 1 has a Population of 77143, Deviation of -2319, Members of 1, and a % Deviation of -0.0291838. The spreadsheet is titled 'House Minimum Renumbered' and is located in the file path 'House_Minimum_Renumbered'.

Full filepath: ES0007C\C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20161201_112948_toshibaInc1350\C\Users\toshiba\Documents\Tom\2017 Redistricting\House Minimum Renumbered.xls

Figure 46: Dr. Hofeller's Draft Plan File: "Johnston Senate Switch.xlsx" (December 11, 2016).

	2011 Enacted			New Plan				New Plan Switch			
10	30852	43836	58.69%	29718	38740	56.59%	-2.10%	30495	37897	55.41%	-3.28%
11	34644	49995	59.07%	38421	47921	55.50%	-3.57%	37654	48764	56.43%	-2.64%
12	30006	41821	58.22%	30006	41821	58.22%	0.00%	30006	41821	58.22%	0.00%

Full filepath: ES0007C\C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20161201_112948_toshibaInc1350\C\Users\toshiba\Documents\Tom\2017 Redistricting\Johnston Senate Switch.xlsx

Figure 48a: Screenshot (Upper Half) of Dr. Hofeller's Draft Plan File: " NC Senate CCNC PPI" (July 8, 2017).

NC Senate CCNC PPI - Excel

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160

A B C D E F G H I J K L M N O P Q R S T

1 **STATE OF NORTH CAROLINA**

2 **STATE SENATE**

3 **CCNC Non-Partisan Redistricting Simulation**

4 **Partisan Breakdown**

Dist.	Tpop	Dev.	% Dev	Tot al Rep.	Total 2 Party	Better Poss.	% Rep.	Incumbent(s)
1	196,665	5,955	3.12%	356,060	742,716	No	47.94%	Vacant (L.D.)
2	183,118	(7,592)	-3.98%	422,047	701,571	No	60.16%	Sanders (R.)
3	182,039	(8,671)	-4.55%	285,752	712,527	No	40.10%	Cook (R.)
4	192,477	1,767	0.93%	274,133	733,123	No	37.39%	Horner (R.)
5	189,510	(1,200)	-0.63%	309,100	672,801	No	45.94%	Davis (D)
6	187,925	(2,785)	-1.46%	258,556	437,069	No	59.16%	Brown (R.)
7	182,118	(8,592)	-4.51%	319,573	627,405	No	50.94%	Pate (R.)
8	199,397	8,687	4.56%	438,008	781,551	Little	56.04%	Rabon (R.)
9	198,108	7,398	3.88%	407,679	788,253	Little	51.72%	Lee (R.)
10	186,168	(4,542)	-2.38%	334,378	600,488	Little	55.68%	Jackson (R.)
11	185,809	(4,901)	-2.57%	382,427	707,621	Little	54.04%	Bryant (D)
12	187,221	(3,489)	-1.83%	330,956	582,353	Little	56.83%	Robin (R.)
13	192,266	1,556	0.82%	215,484	524,397	No	41.09%	Britt (R.)
14	188,986	(1,724)	-0.90%	245,023	689,714	Yes	35.53%	Blue (D)
15	190,212	(498)	-0.26%	297,349	819,109	Yes	36.30%	Chaudhuri (D)/Alexander (R.)
16	197,978	7,268	3.81%	392,898	829,182	Yes	47.38%	Barringer (R.)
17	193,237	2,527	1.33%	435,525	791,717	Yes	55.01%	Vacant (R.)
18	191,199	489	0.26%	424,763	791,586	Yes	53.66%	Barfoot (R.)
19	182,470	(8,240)	-4.32%	282,819	635,389	Yes	44.51%	Merideth (R.)
20	183,182	(7,528)	-3.95%	155,365	761,418	Yes	20.40%	McKissick (D)/Woodard (D)
21	183,913	(6,797)	-3.56%	172,280	500,226	Yes	34.44%	Clark (D)
22	183,785	(6,925)	-3.63%	295,874	716,173	Yes	41.31%	Vacant (D)
23	197,306	6,596	3.46%	308,217	884,598	No	34.84%	Foushee (D)
24	197,106	6,396	3.35%	401,980	723,281	Yes	55.58%	Gunn (R.)
25	197,991	7,281	3.82%	374,630	727,254	No	51.51%	McInnis (R.)
26	197,998	7,288	3.82%	416,552	703,860	Little	59.18%	Berger (R.)
27	197,286	6,576	3.45%	383,351	767,066	Yes	49.98%	Robinson (D)

Sheet1 Sheet2 Sheet3

Ready 115%

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Figure 48b: Screenshot (Lower Half) of Dr. Hofeller's Draft Plan File: " NC Senate CCNC PPI" (July 8, 2017).

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
34		28	197,917	7,207	3.78%	228,801	795,720	Yes	28.75%	Vacant (D)										
35		29	188,980	(1,730)	-0.91%	453,676	675,584	Yes	67.15%	Tillman (R.)										
36		30	199,293	8,583	4.50%	442,736	727,374	Little	60.87%	Ballard (R.)/Rendleman [®]										
37		31	191,778	1,068	0.56%	434,610	775,754	Yes	56.02%	Davis [*]										
38		32	200,132	9,422	4.94%	310,613	738,852	Yes	42.04%	Lowe (D)/Krawiec (R.)										
39		33	190,676	(34)	-0.02%	423,380	647,504	No	65.39%	Dunn(R.)										
40		34	197,843	7,133	3.74%	484,196	730,391	No	66.29%	Vacant (R.)										
41		35	197,197	6,487	3.40%	458,688	695,459	No	65.95%	Tucker (R.)										
42		36	182,106	(8,604)	-4.51%	403,831	657,791	No	61.39%	Newton (R.)										
43		37	183,195	(7,515)	-3.94%	191,909	602,729	Yes	31.84%	Ford (D)										
44		38	188,399	(2,311)	-1.21%	217,917	658,158	Yes	33.11%	Jackson (D)/Bishop (R.)										
45		39	183,574	(7,136)	-3.74%	444,757	754,873	Yes	58.92%	Vacant (R.)										
46		40	182,572	(8,138)	-4.27%	260,436	638,637	Yes	40.78%	Wadell (D)										
47		41	181,888	(8,822)	-4.63%	293,905	690,861	Yes	42.54%	Iarte (R.)										
48		42	191,556	846	0.44%	458,067	696,077	No	65.81%	Wells (R.)										
49		43	189,586	(1,124)	-0.59%	392,125	627,739	Little	62.47%	Harrington (R.)										
50		44	192,843	2,133	1.12%	443,154	702,031	Little	63.12%	Curtis (R.)										
51		45	199,013	8,303	4.35%	464,022	719,888	No	64.46%	Vacant (R.)										
52		46	191,738	1,028	0.54%	407,367	637,986	No	63.85%	Daniel (R.)										
53		47	187,477	(3,233)	-1.70%	408,302	688,768	No	59.28%	Hise (R.)										
54		48	190,126	(584)	-0.31%	447,235	762,284	Little	58.67%	Edwards (R.)										
55		49	188,022	(2,688)	-1.41%	322,431	794,686	Little	40.57%	Van Dyne (D)										
56		50	194,102	3,392	1.78%	408,838	726,260	No	56.29%	Davis (R.)										
57																				
58				% Range	Num.	Cumm.														
59				60-100	12	12														
60				55-60	12	24														
61				53-55	2	26														
62				50-53	3	29														
63				45-50	4	33														
64				40-45	8	41														
65				0-40	9	50														
66					50															
67																				

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EXHIBIT 2

Figure 1

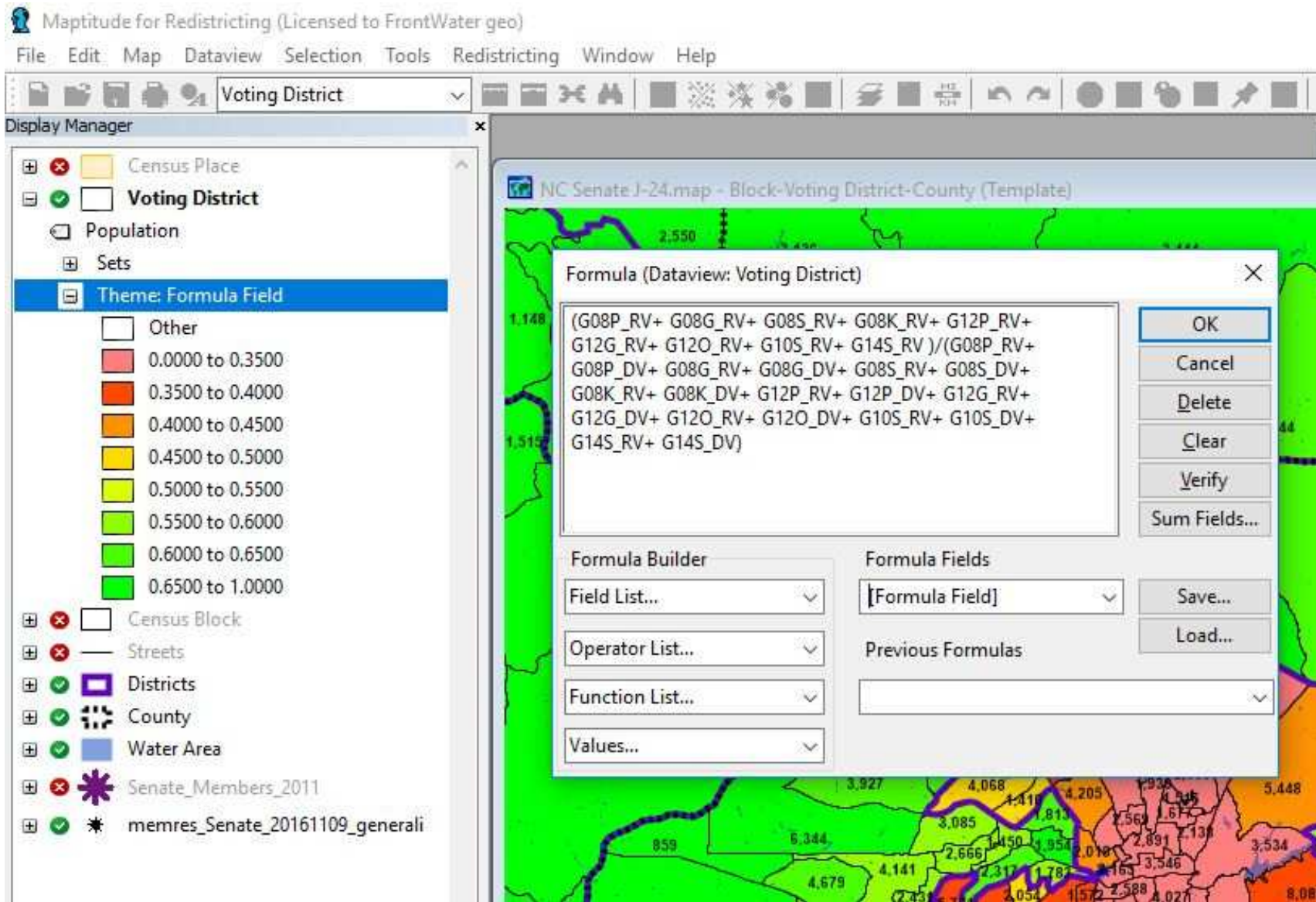


Figure 2

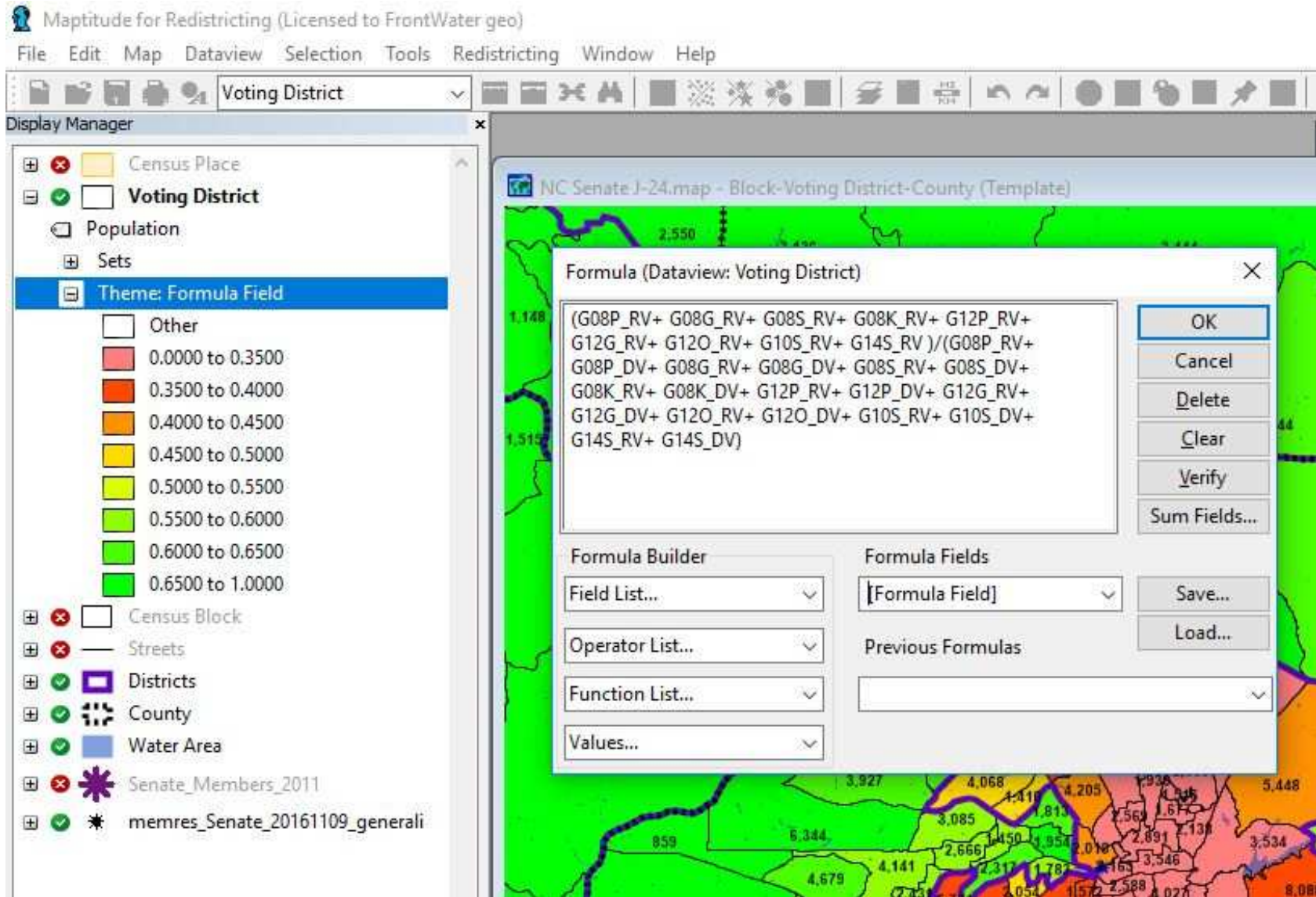


Figure 3

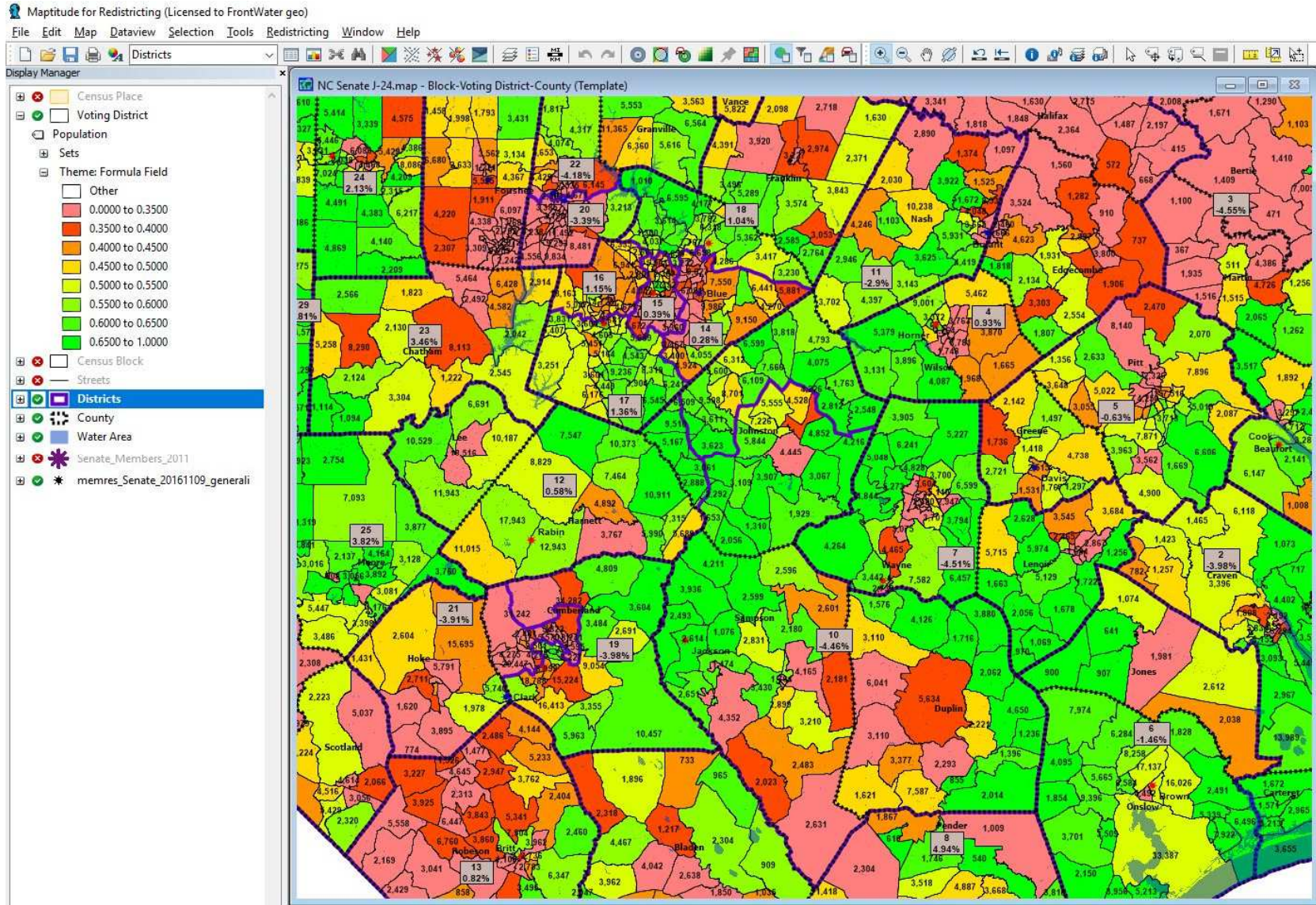


Figure 4

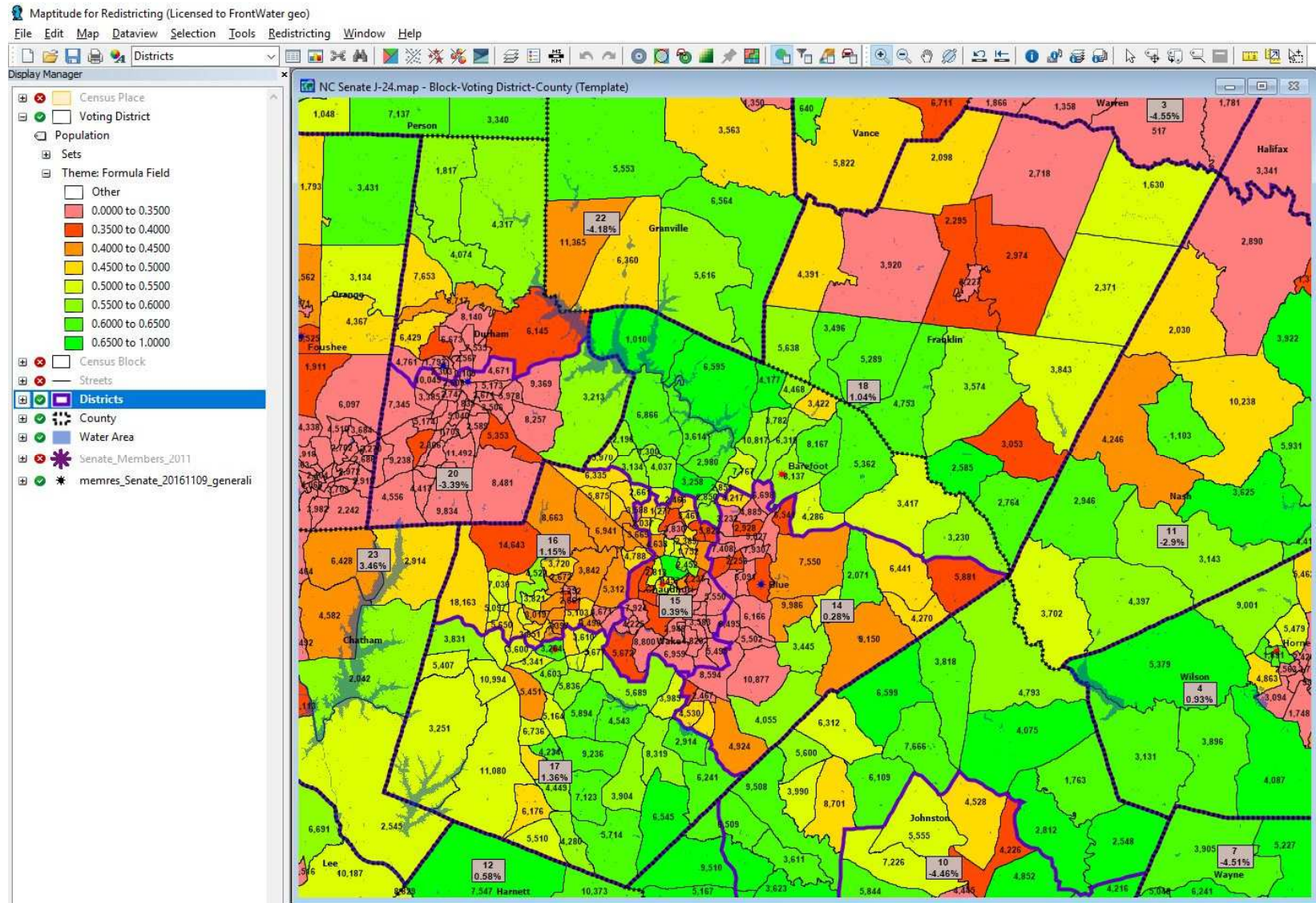


Figure 5

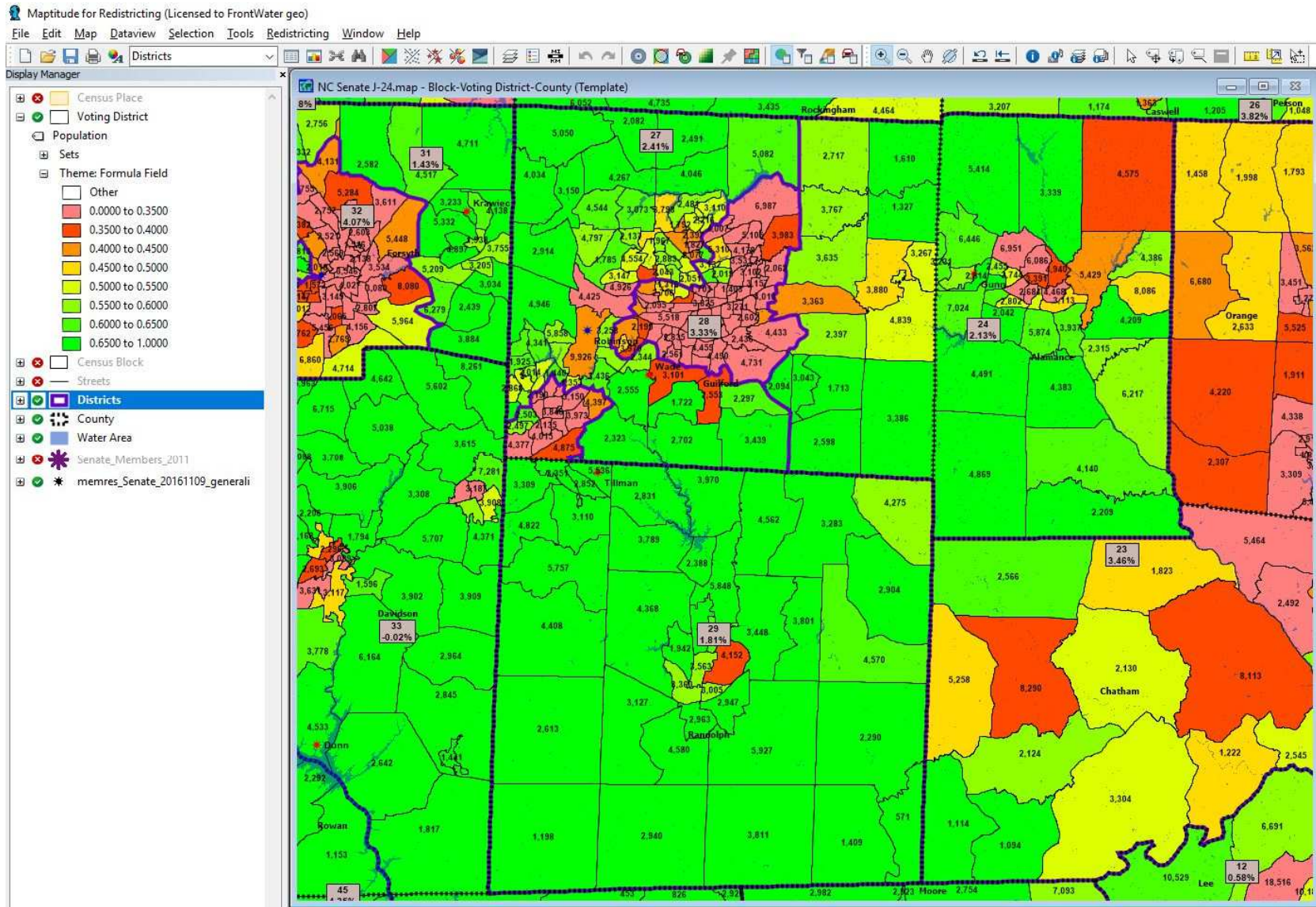


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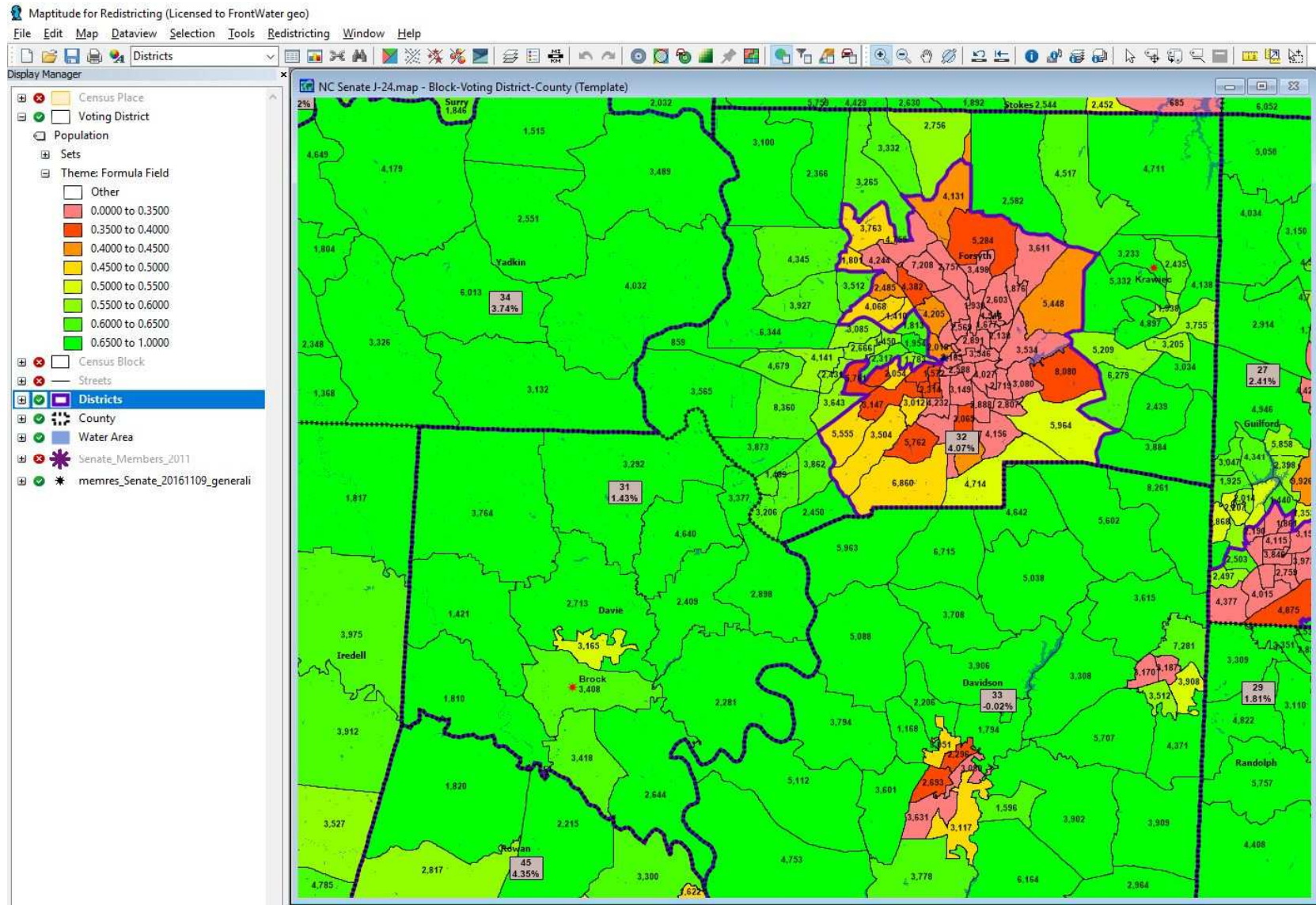


Figure 7

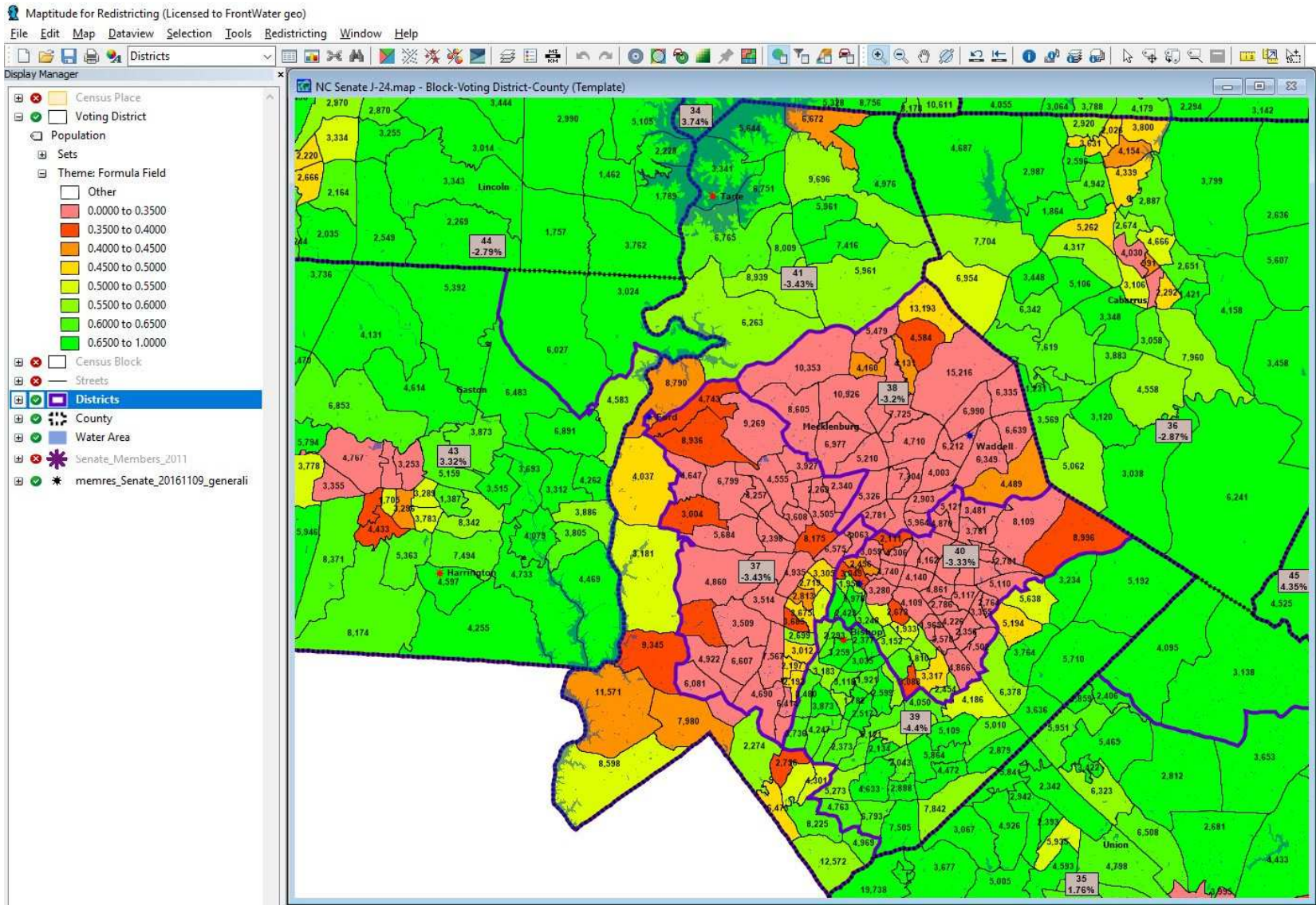


Figure 8

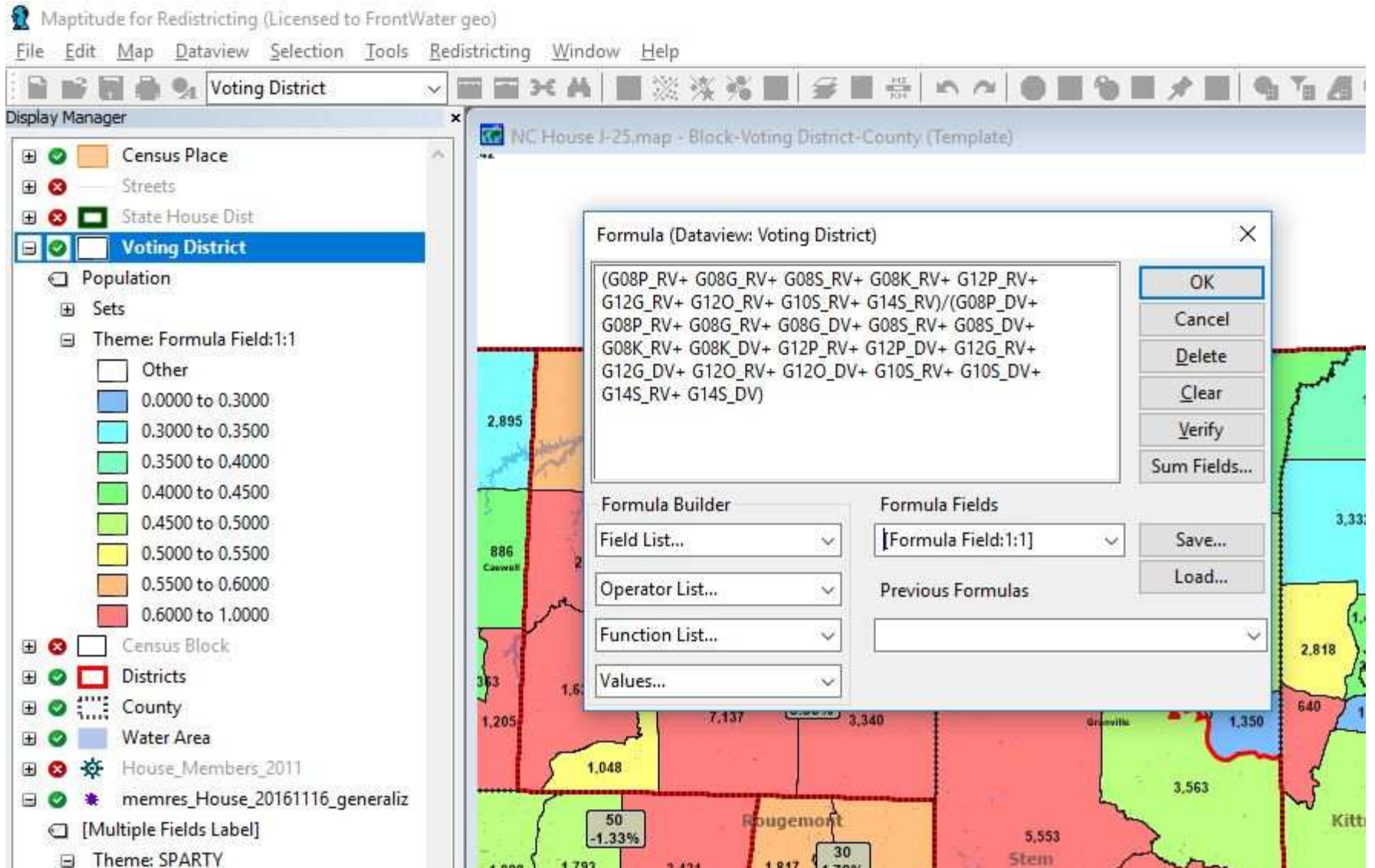


Figure 9

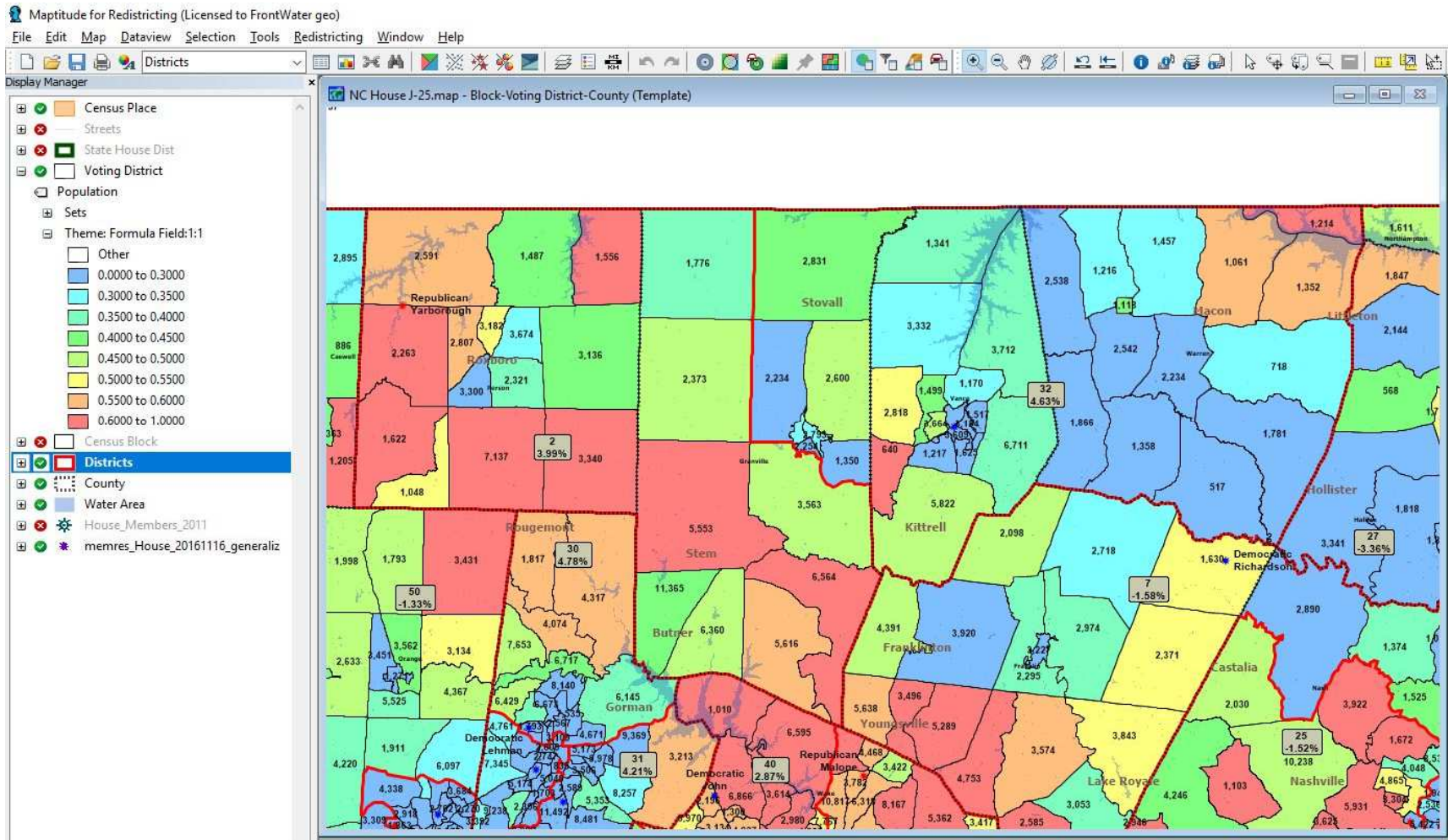


Figure 10

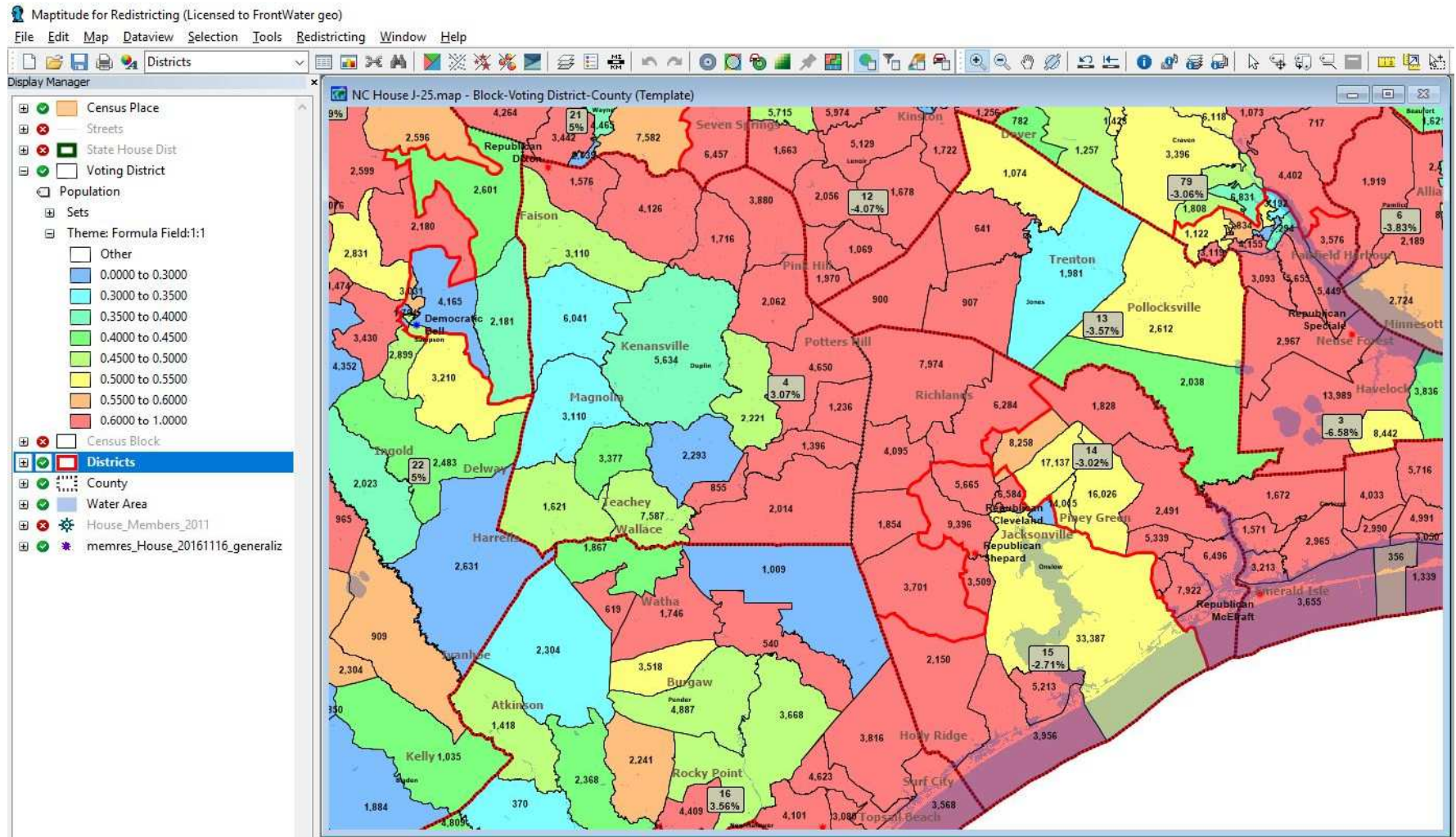


Figure 11

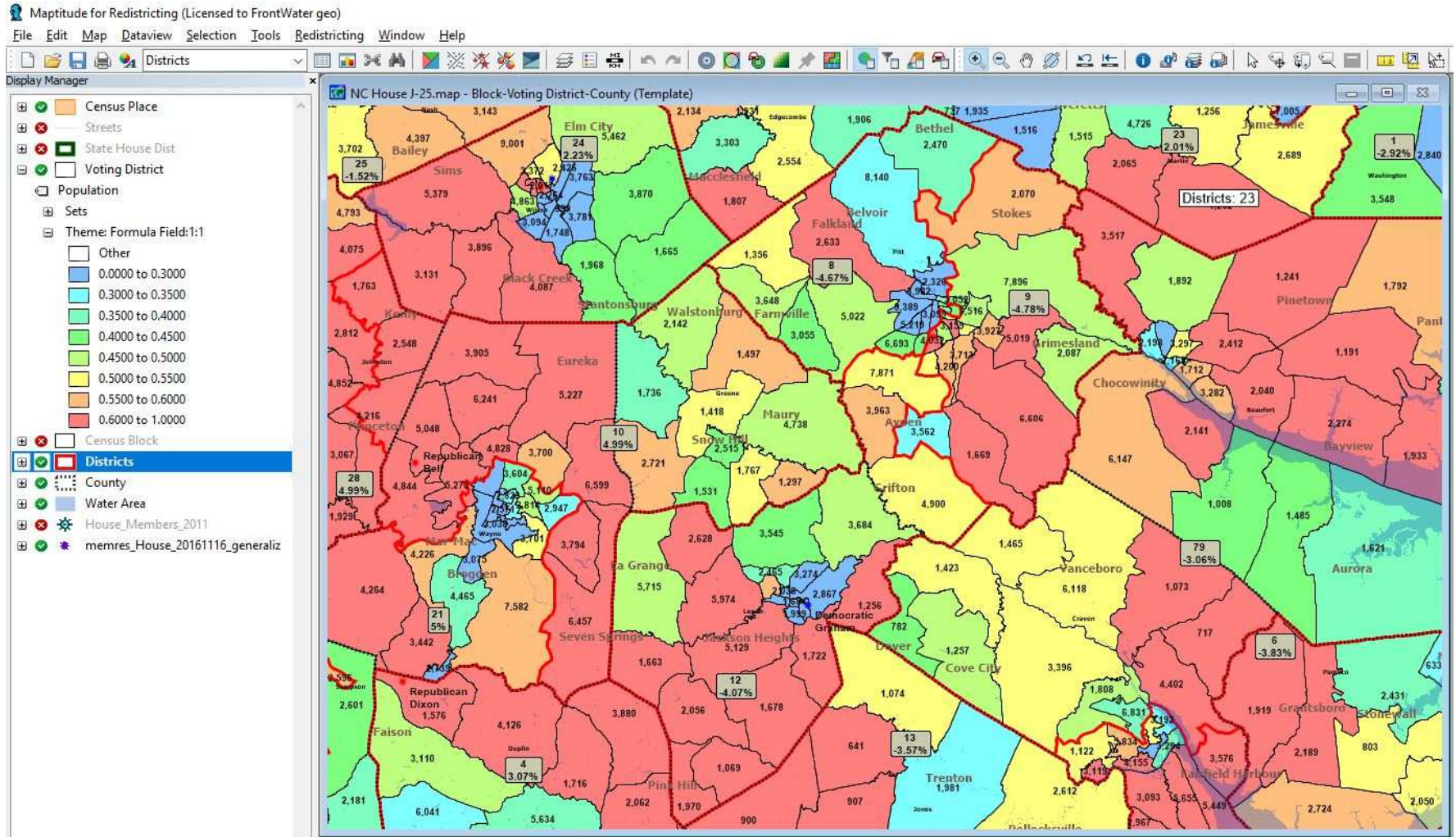


Figure 12

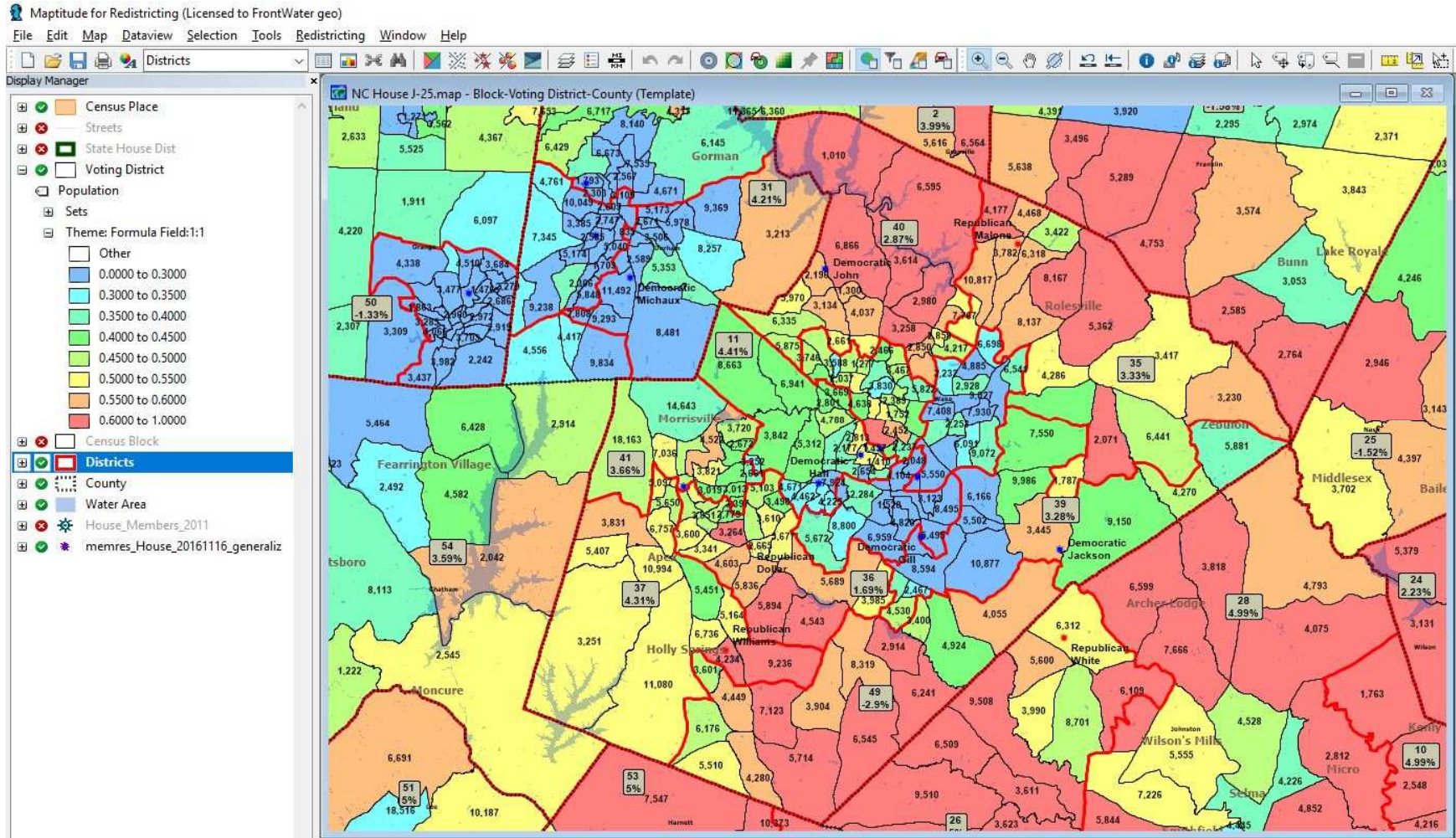


Figure 13

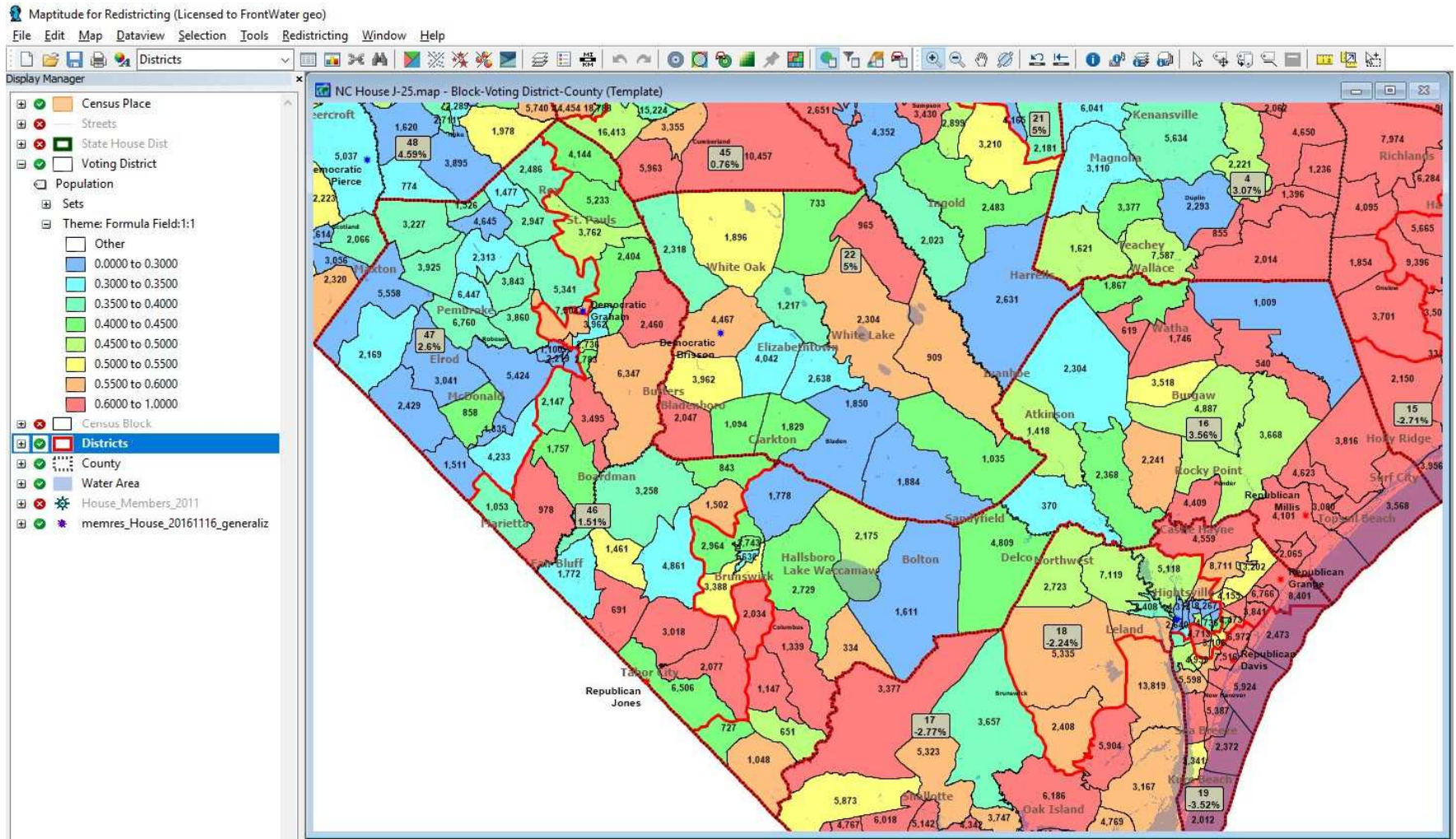


Figure 14

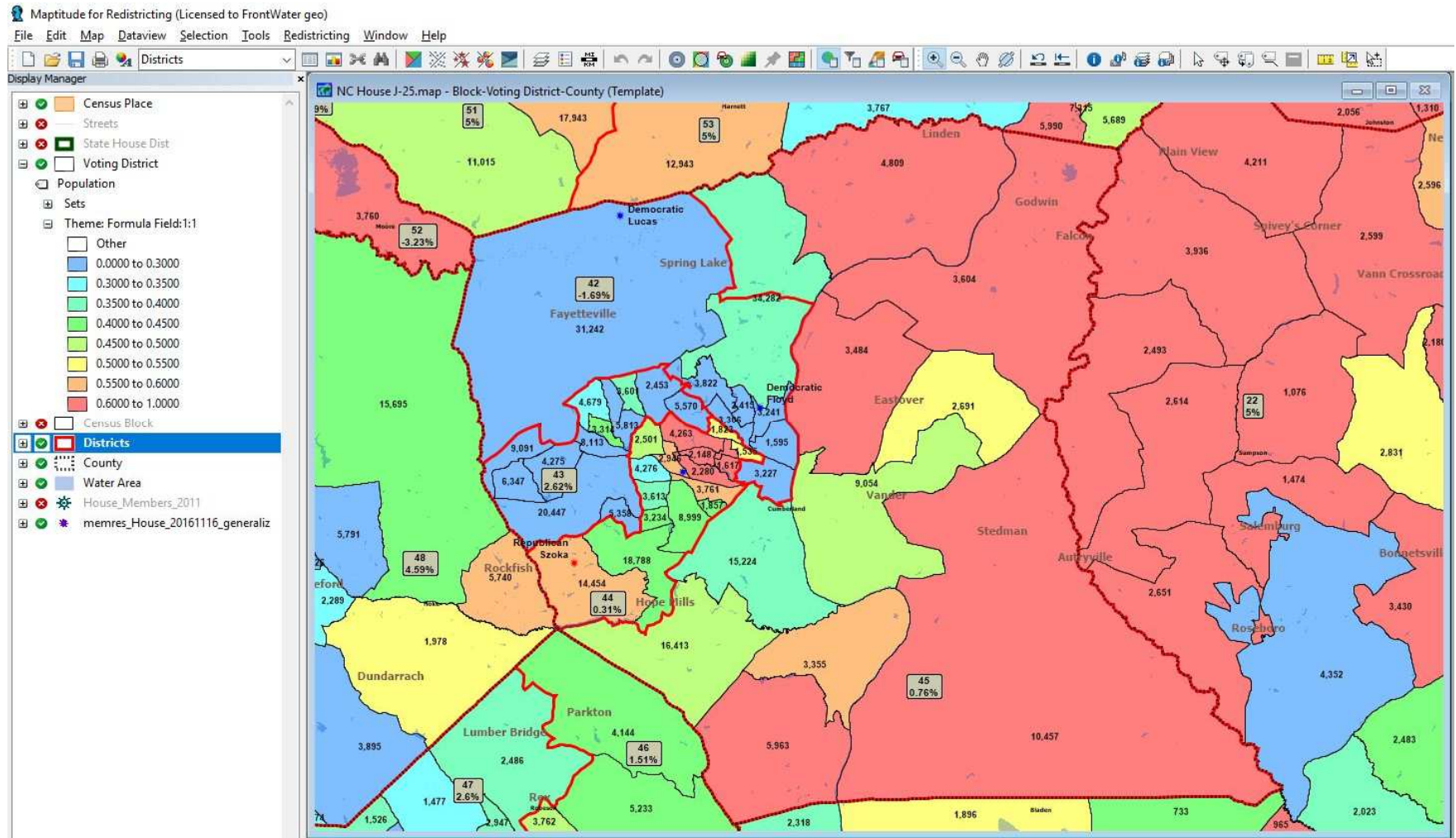


Figure 15

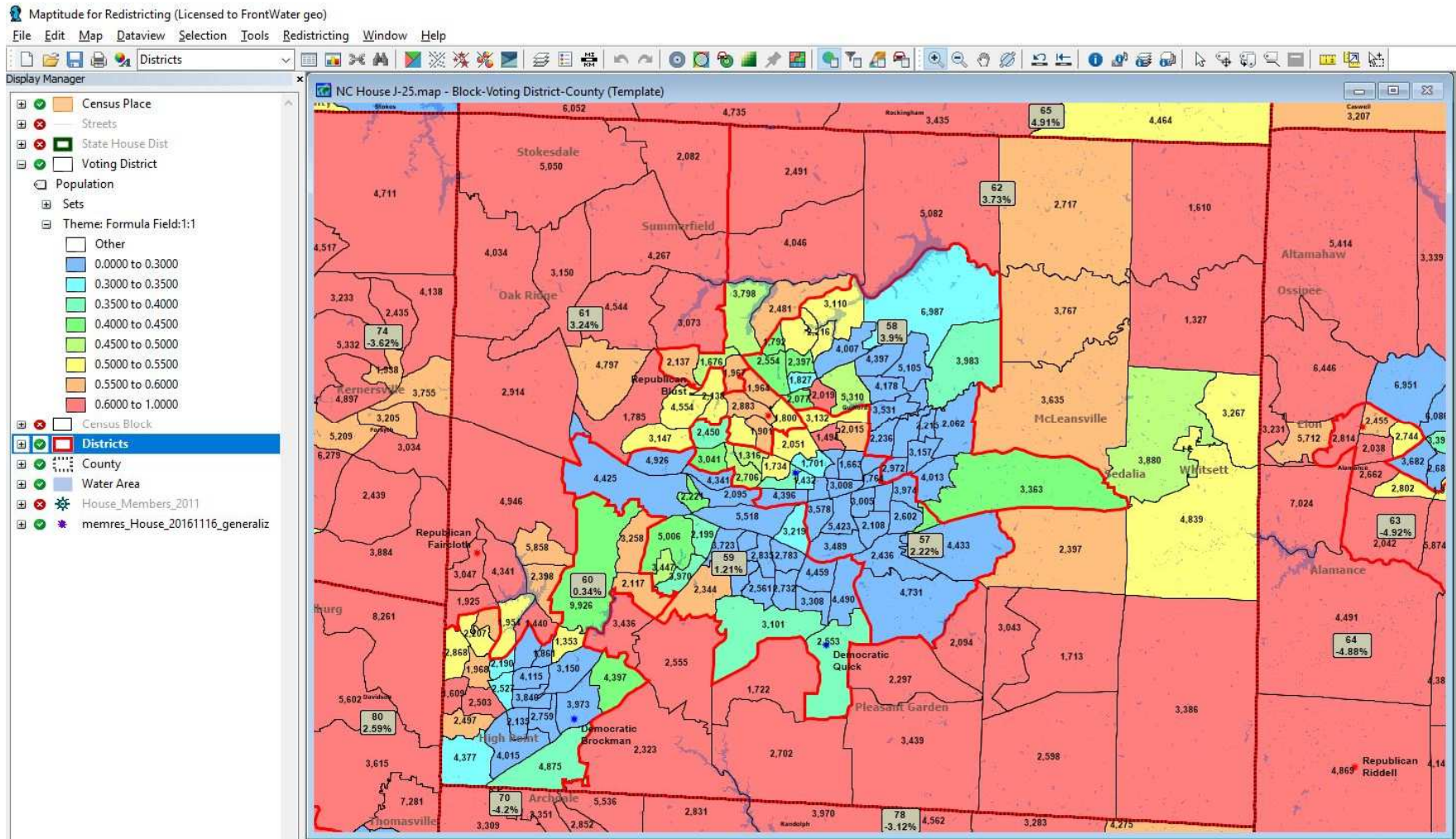


Figure 16

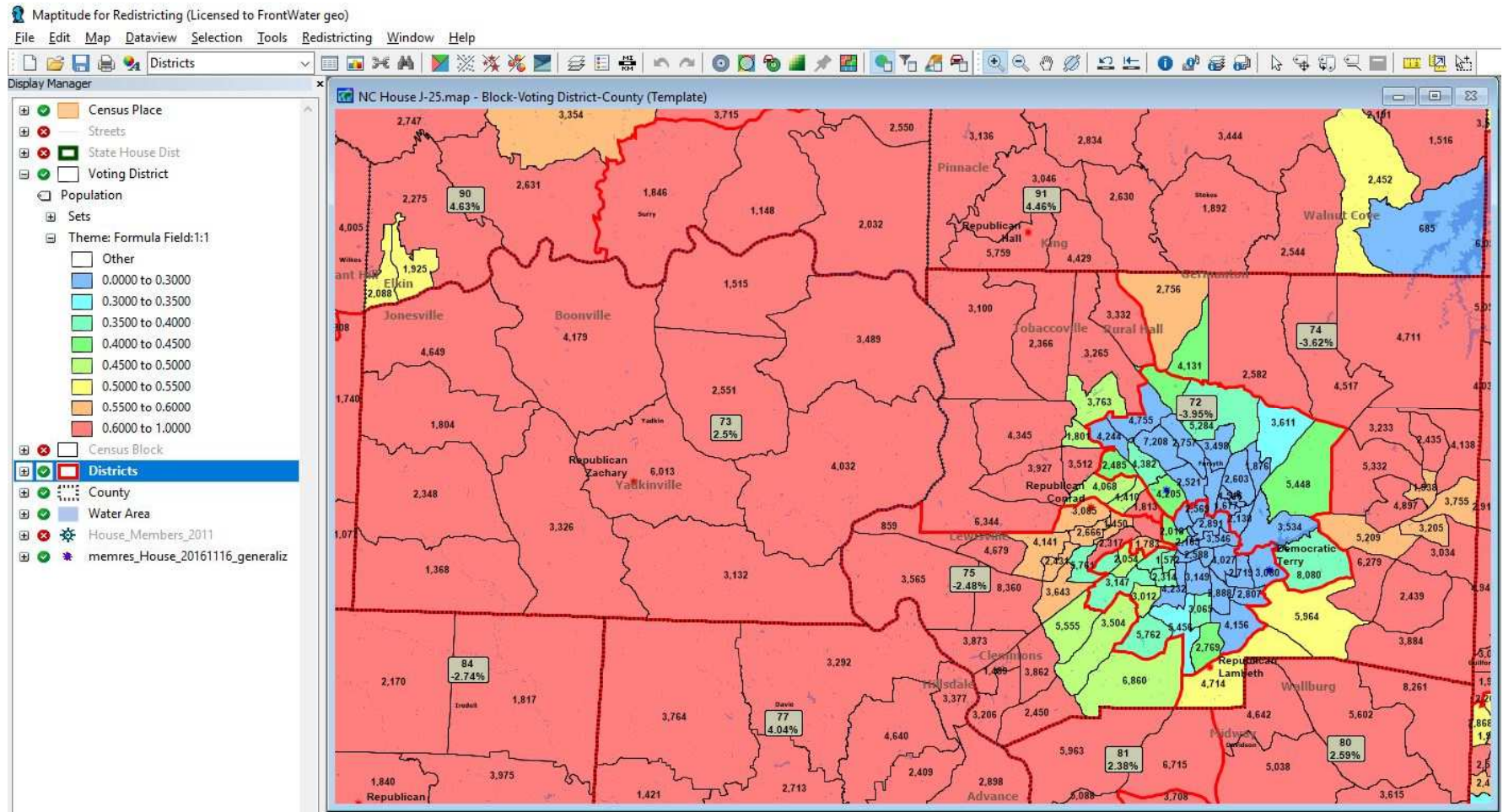


Figure 17

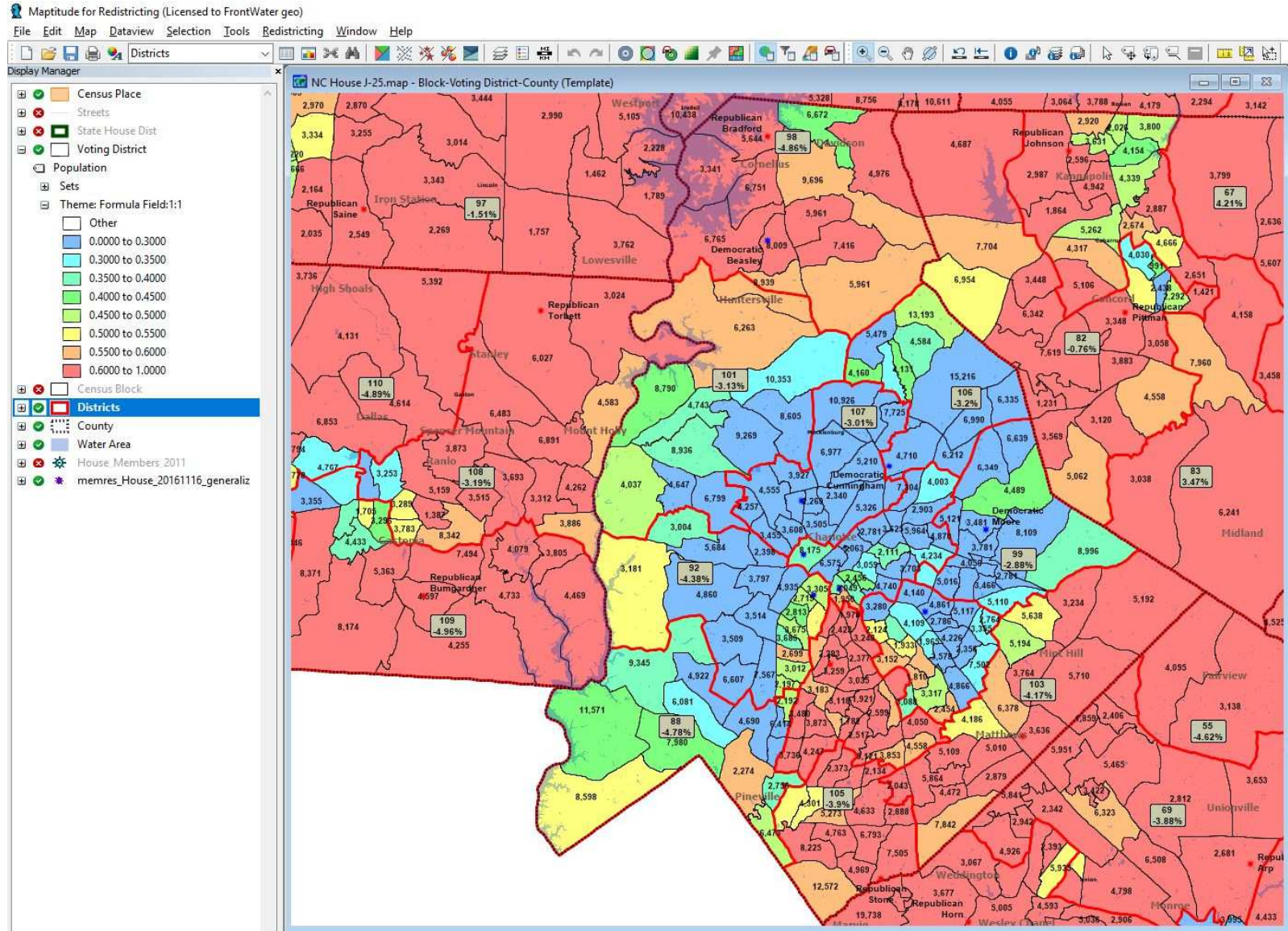


Figure 18

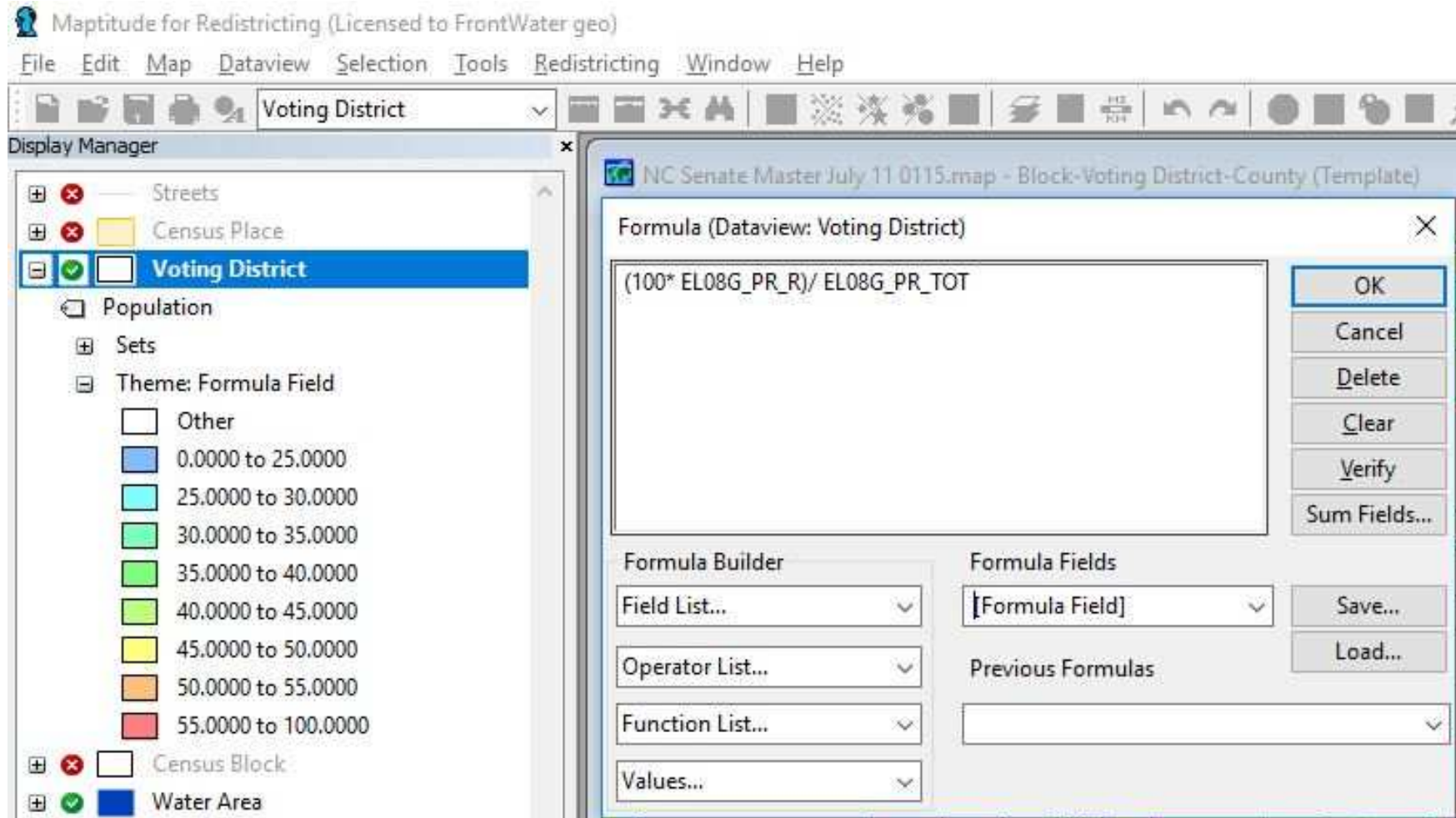


Figure 19

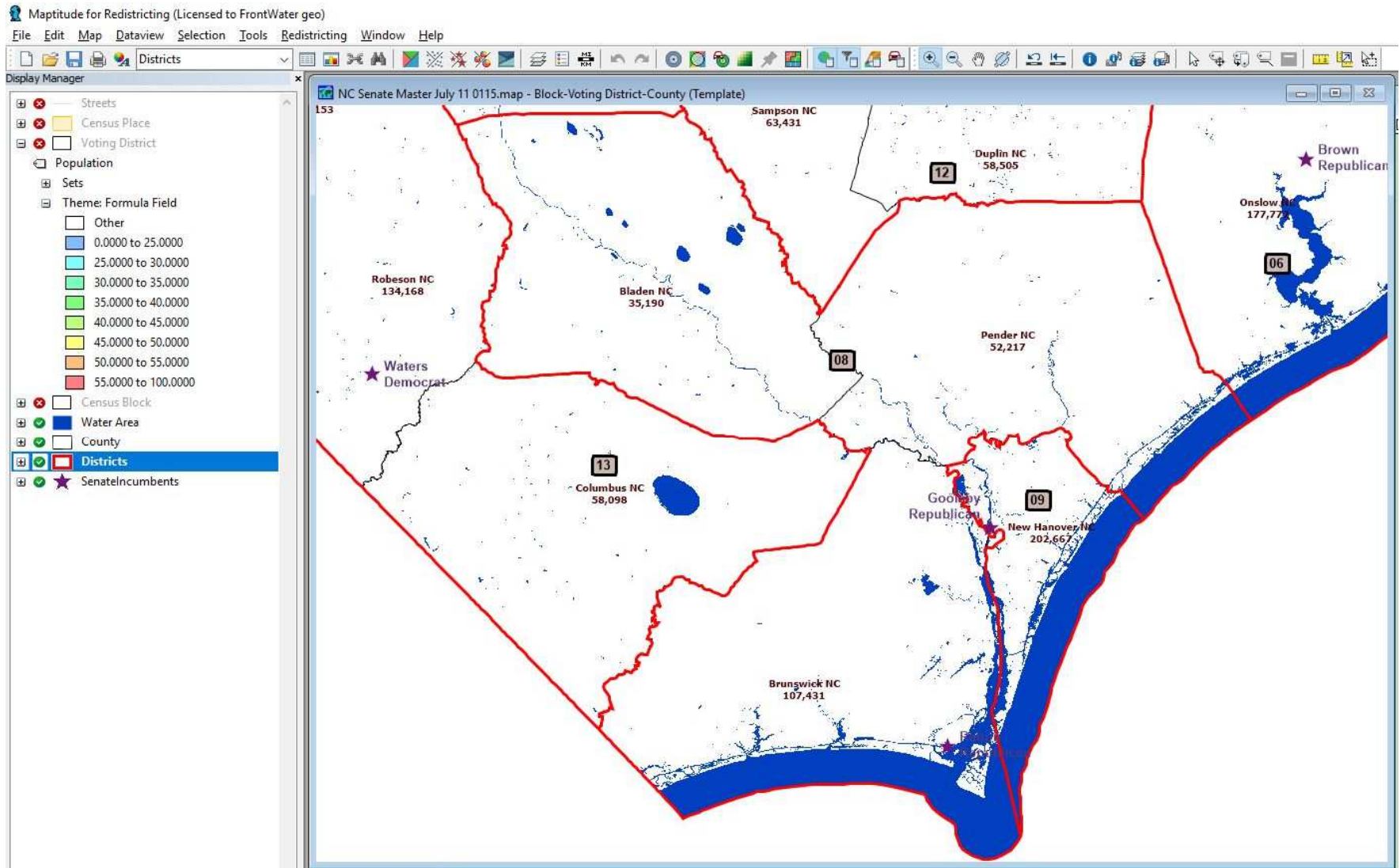


Figure 20

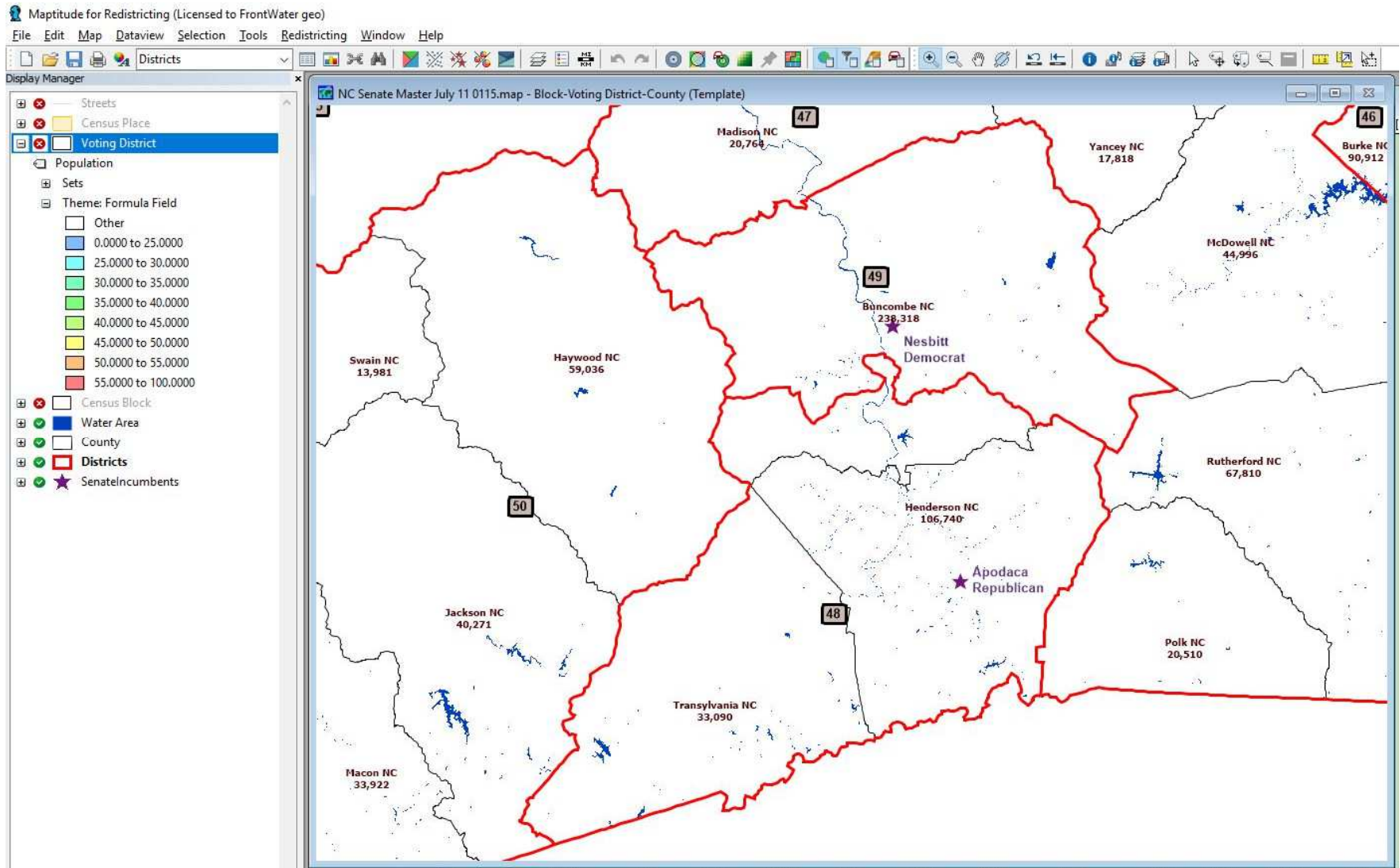


Figure 21

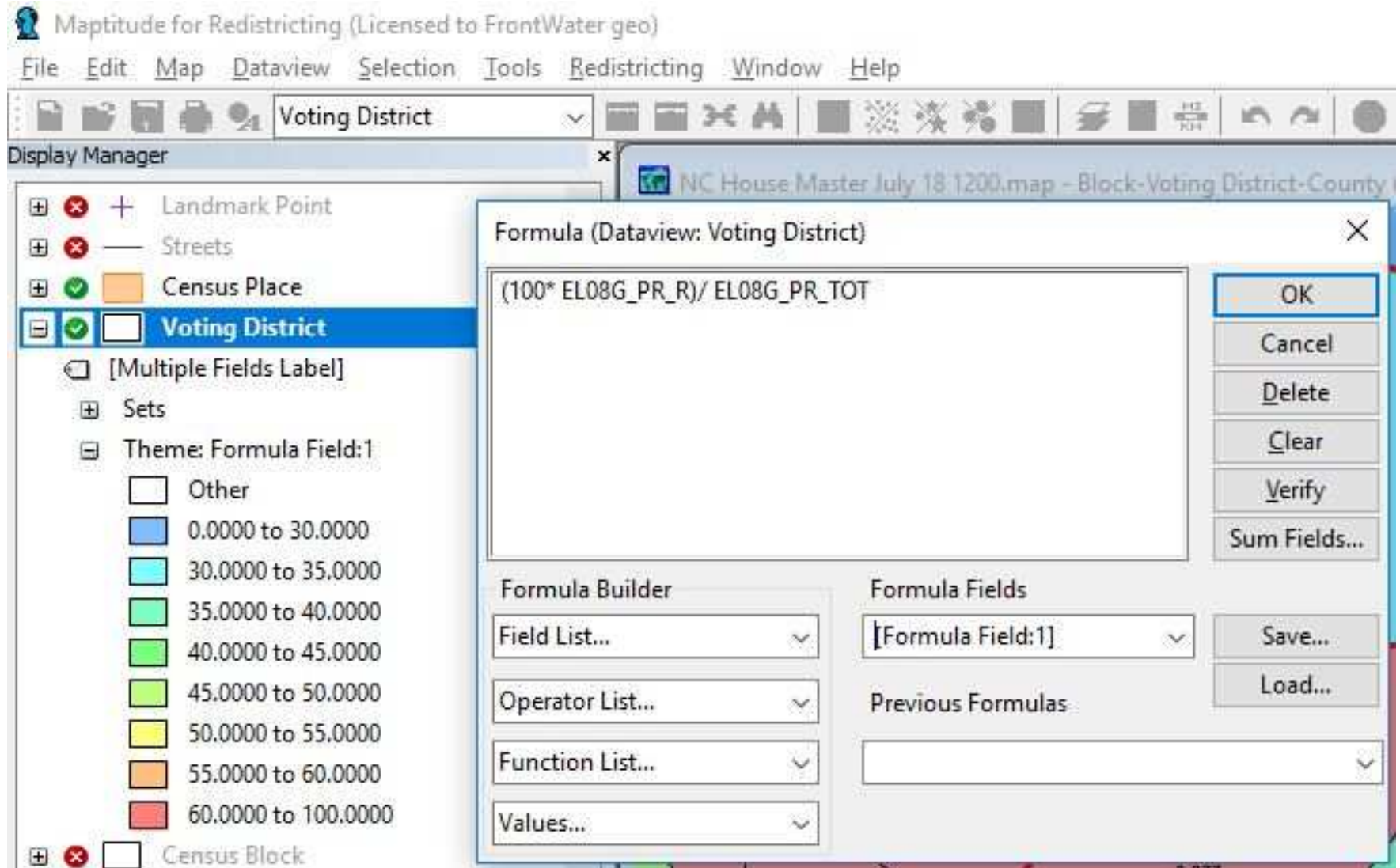


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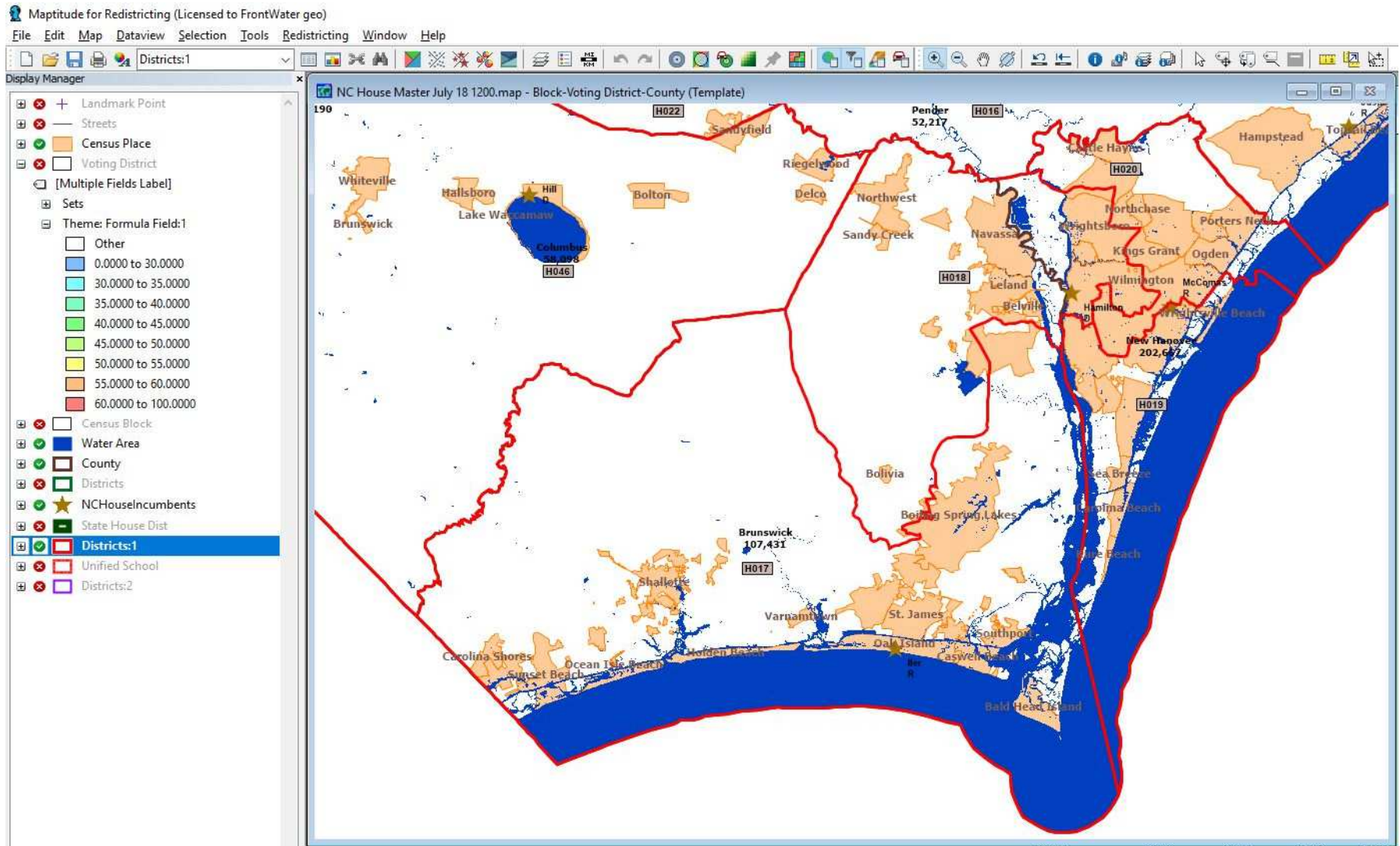


Figure 24

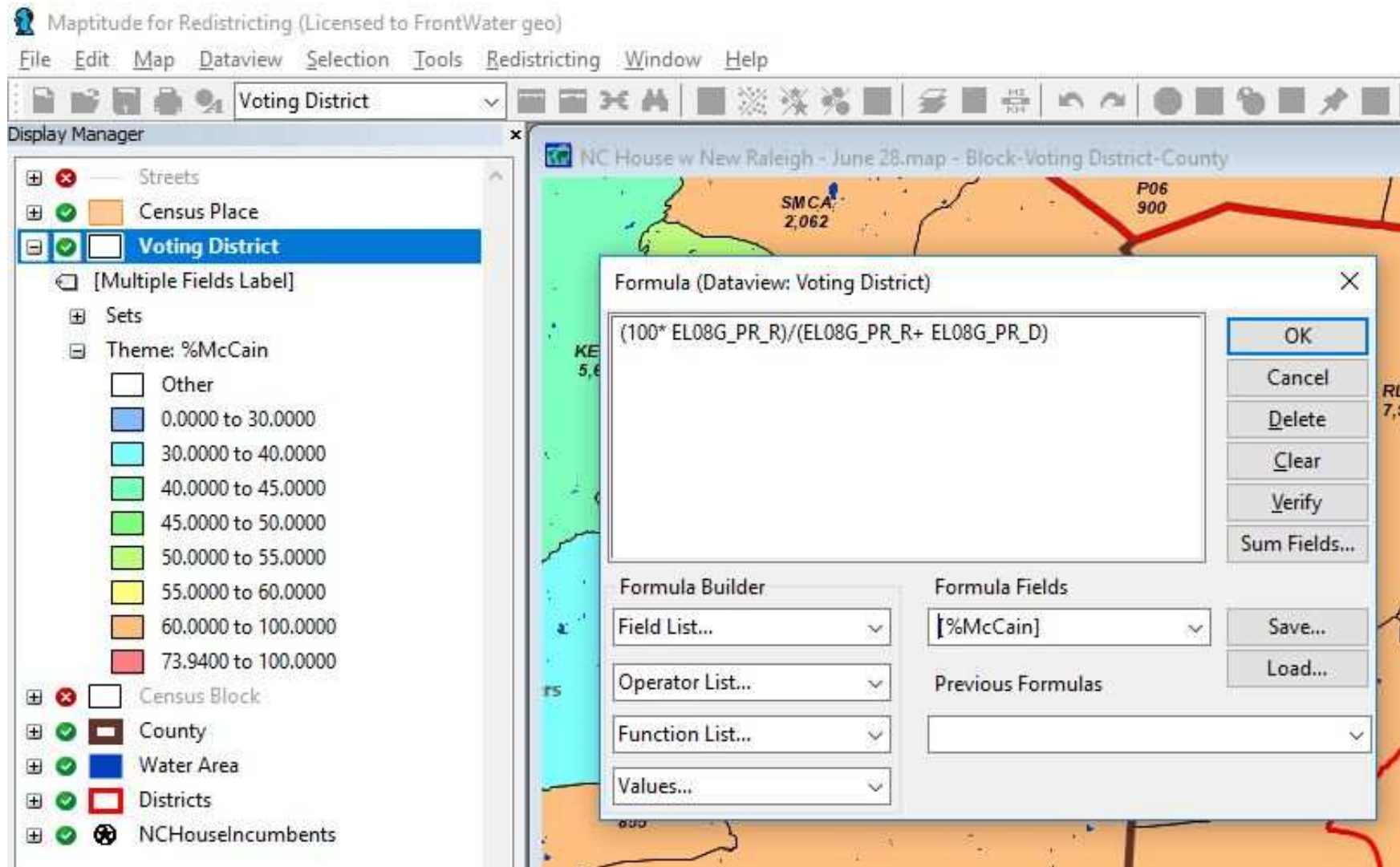


Figure 25

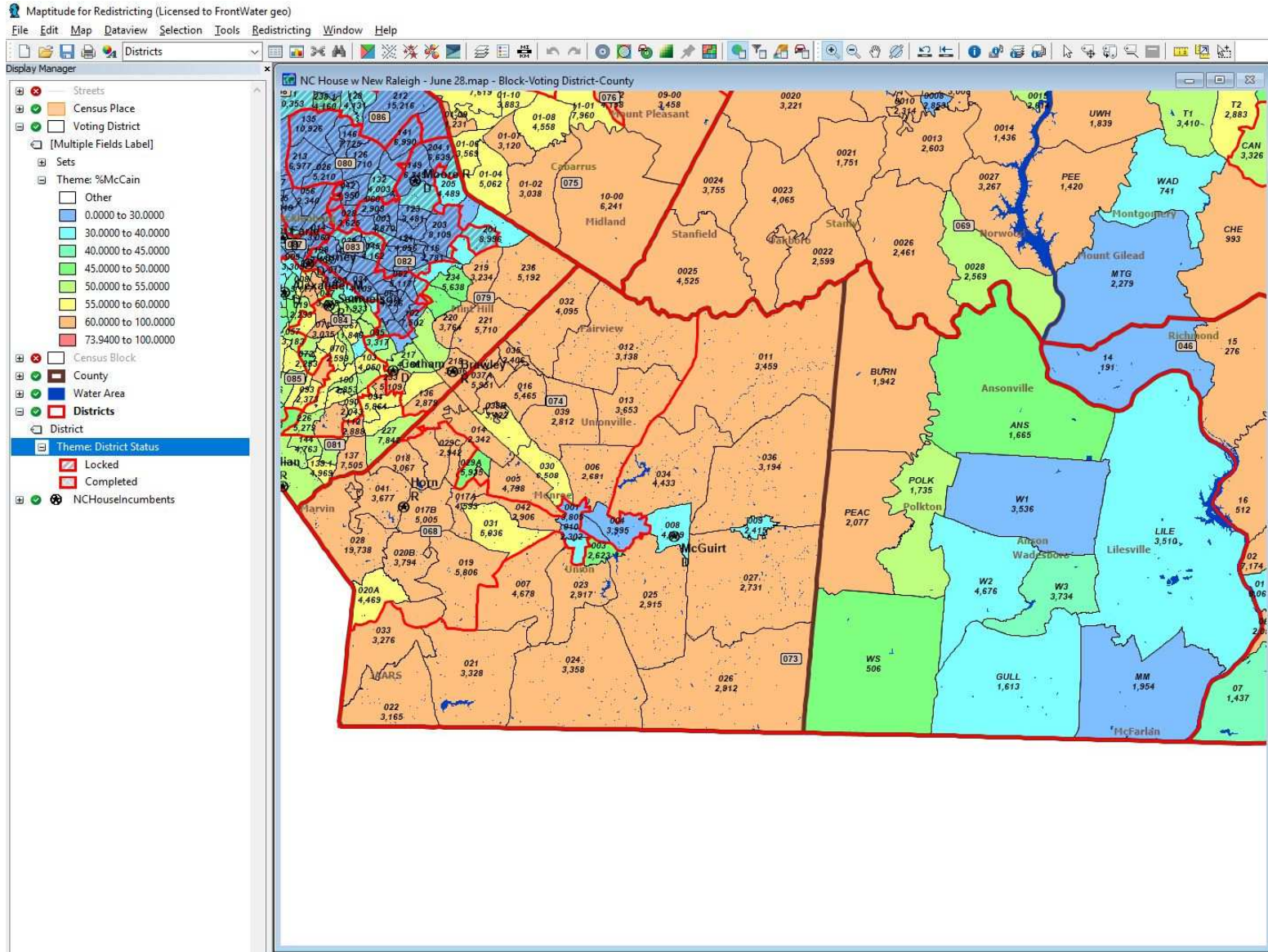


Figure 26

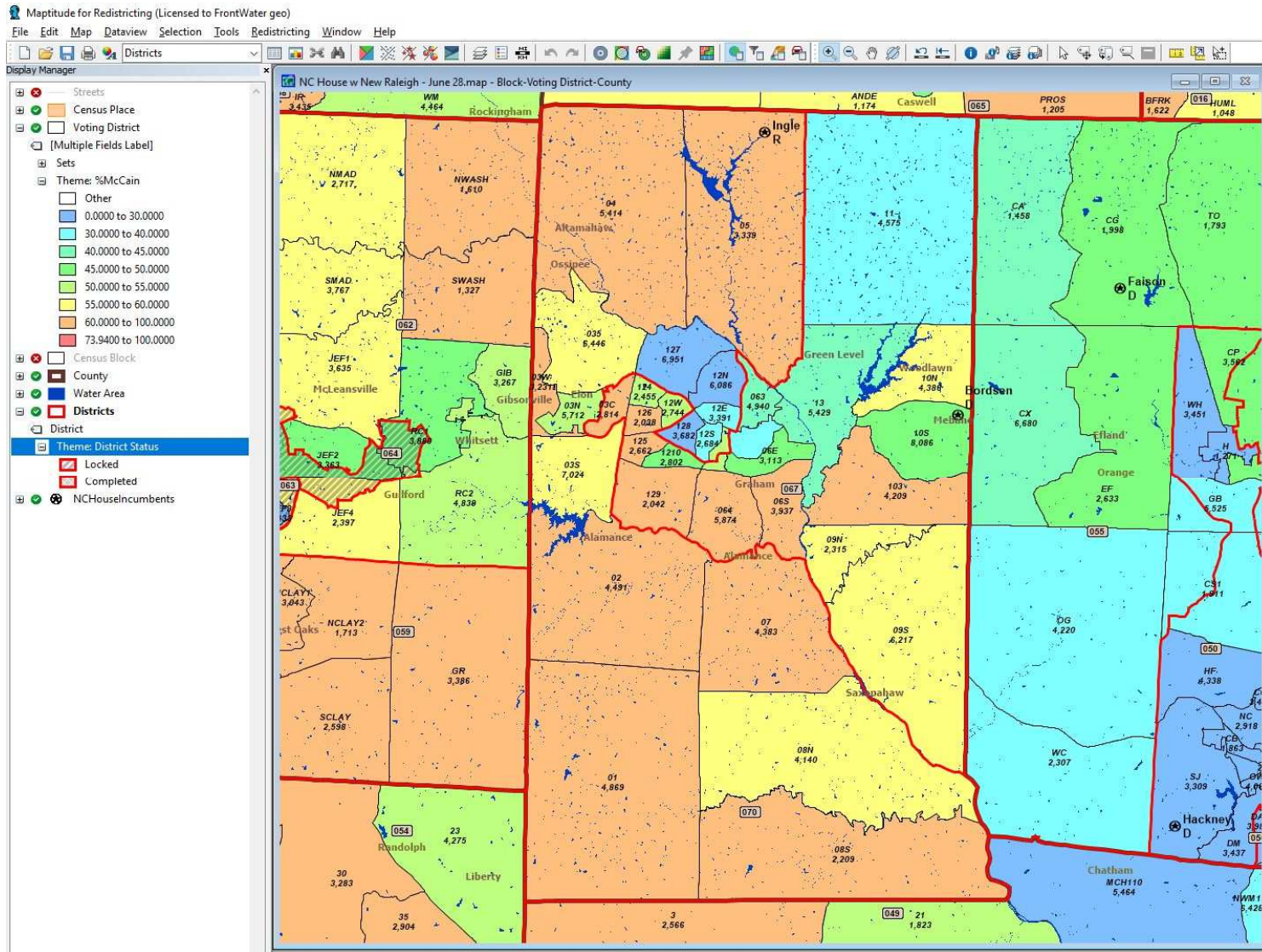


Figure 27

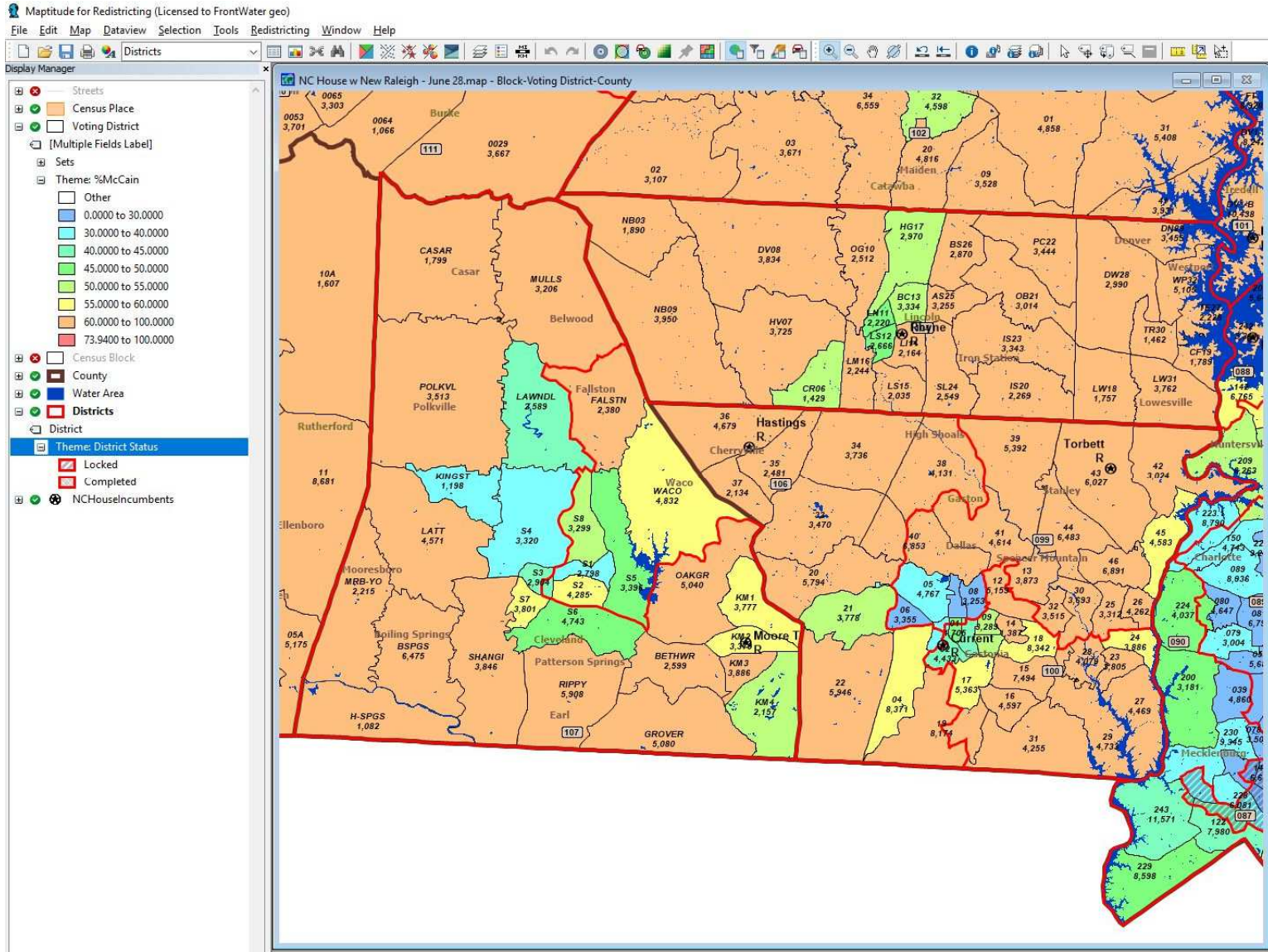


Figure 28

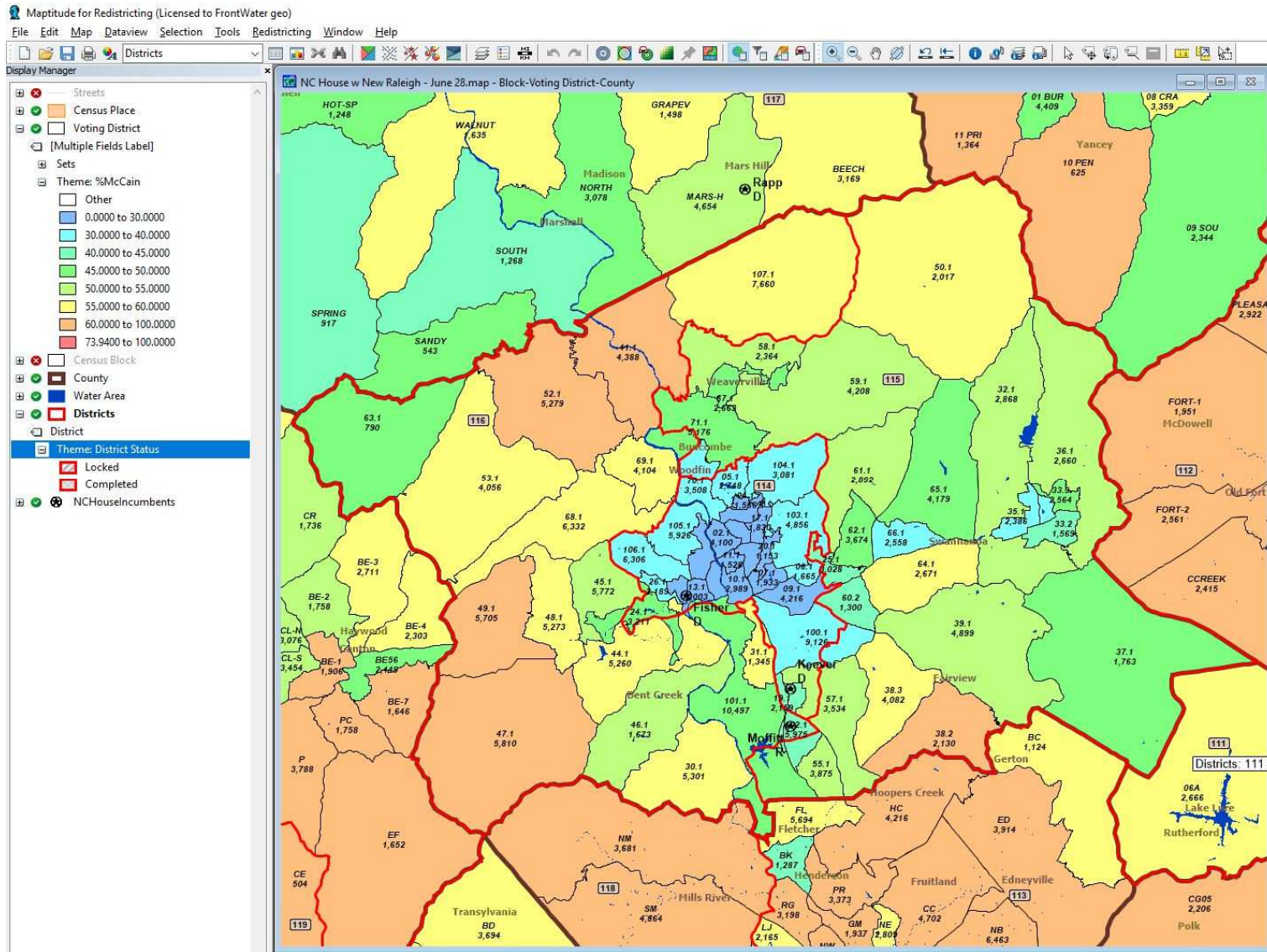


EXHIBIT 3

**IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION**

STATE OF NORTH CAROLINA)	
WAKE COUNTY)	
)	
COMMON CAUSE, et al.)	
Plaintiffs,)	Case No. 18-CVS-014001
)	
v.)	
)	
Representative DAVID R. LEWIS,)	
in his official capacity as Senior)	
Chairman of the House Select)	
Committee on Redistricting, et al.,)	
)	
Defendants.		

DECLARATION OF JON G. MATTHEWS

1. I, Jon G. Matthews, declare under the penalty of perjury that the following is true, based upon my personal knowledge. If called to do so, I can and will testify as follows:

2. I am currently employed by Stroz Friedberg, an Aon company (“Stroz Friedberg”), in their Washington D.C. office. My title is Vice President, Digital Forensics and Incident Response. I am responsible for conducting digital forensic acquisitions and analysis; performing comprehensive immediate response functions for network and data breach incidents; conducting electronic discovery and data production operations involving preservation, processing, and production of electronic data from a variety of digital sources; conducting technical security reviews; and providing expert testimony regarding the methods, results, and accuracy of forensic findings. In my career, I have forensically imaged and analyzed hundreds of pieces of digital media to include desktop computers, laptops, servers, external storage devices, and mobile devices. I have been involved in hundreds of computer forensic cases for the United States government and Stroz Friedberg involving espionage, insider threats, nation state cyber intrusions, ransomware attacks, business email compromises, and other various engagements for digital investigations.

3. I hold a Bachelor of Science in Computer Networks Security with a Minor in Cybersecurity and certificate in Computer Networking from the University of Maryland University College. In addition, I have a graduate certificate from the SANS Technology Institute. I hold the following certifications: Certified Information Systems Security Professional (ISC2), Global Information Assurance Certification (GIAC) Certified Incident Handler, GIAC Certified Forensic Analyst, GIAC Network Forensic Analyst, GIAC

Reverse Engineering Malware, GIAC Advanced Smartphone Forensics, and Certified Ethical Hacker. Previously, I was in the United States Army as a Counterintelligence Special Agent. I have attended over 500 hours of digital forensics training on evidence collection and digital investigations through the Defense Cyber Investigations Training Academy and the Joint Counterintelligence Training Academy. I was a Department of Defense Cyber Crime Investigator, Computer Forensic Examiner, and Digital Media Collector.

4. I was an instructor at the United States Army Intelligence Center of Excellence in Fort Huachuca, AZ, where I was the Senior Faculty Advisor for the Counterintelligence Officer Course. I designed and delivered training programs for Officers, Warrant Officers, and Military Intelligence Civilian Excepted Career Program (MICECP) personnel in Counterintelligence investigations, military Counterintelligence collections, surveillance, cyber, and evidence collection. I also developed specialized training on collection of digital evidence collected from hard drives, mobile devices, network logs, and witness devices. Attached as Exhibit A is my Curriculum Vitae.

5. On March 7, 2019, Stroz Friedberg was engaged by Arnold & Porter Kaye Scholer LLP, on behalf of Common Cause in the matter of Common Cause v. Lewis, 18-CVS-014001.

6. On March 13, 2019, Stroz Friedberg's Washington DC office took custody of a sealed package from R. Stanton Jones of Arnold & Porter Kaye Scholer LLP. The package was sent to R. Stanton Jones from a Stephanie Hofeller in Lexington, KY via FedEx standard overnight shipping.

7. Upon receipt of this package, Stroz Friedberg opened the package and logged receipt of twenty two (22) pieces of digital media via our chain of custody process. This process includes photographing each device, noting identifying information such as serial number, receiving signatures for the provider and recipient of the device, and subsequent logging of all access to, and further material transfer of the device.

8. Once logged into evidence, each device was then imaged using industry standard methods and tools for digital forensic preservation, including write-blocking technology to preserve the sanctity of the data on the device. Two forensic duplicates of each piece of media were made for redundancy purposes. The hash value of the forensic image is then compared to the original device to ensure the forensic image is an exact bit-stream copy of the original.

9. Stroz Friedberg has maintained continuous and secure custody of all twenty-two (22) devices received from Arnold & Porter Kaye Scholer LLP, and there has been no change, alteration to, or tampering with the twenty-two (22) devices since taking them into our control.

10. On May 3, 2019, Stroz Friedberg provided the North Carolina Department of Justice, Setec Investigations¹, and Virtacore Systems² each with three internal SATA hard drives containing forensic images of the twenty-two (22) pieces of media that Stroz Friedberg received from Arnold & Porter Kaye Scholer LLP on March 13, 2019. The hard drives were provided with full-disk encryption and instructions on how to access the forensic images.

¹ Setec Investigations is a computer forensics and investigations company.

² Virtacore Systems is a cloud solutions company.


11. Attached as Exhibit B is a spreadsheet listing four hundred and ninety two (492) files Stroz Friedberg sent to Plaintiffs' experts, Blake Esselstyn, Jowei Chen, Christopher Cooper, and Wesley Pegden for analysis. The files were exported from two (2) different pieces of digital media referenced in paragraph nine (9) above, ES0004B³, a Seagate Backup Plus Portable, serial number NA7QGNQM , 1 TB, external hard disk drive, contained in a blue silicone case, labeled "#1" and ES0007C⁴ a Seagate Backup Plus Portable, serial number NA7J06GX, 1.5 TB, external hard disk drive, silver and black in color, labeled "#3.". The export contained one (1) file from ES0004B and four hundred and ninety one (491) files from ES0007C. The four hundred and ninety two (492) files listed in Exhibit B is not the total listing of files on the devices. Exhibit B lists the earliest dates Stroz Friedberg sent each of the files to the Plaintiffs' experts.

12. The metadata available for a file depends on the file system of the media on which the file resides and the application that was used to create the file. For each of the files referenced in paragraph eleven (11), Exhibit B also lists the Last Accessed, Created, and Last Modified dates as recorded in the file system of the external drive. Software applications may capture additional metadata information that is stored within the document itself and is commonly referred to as embedded metadata to distinguish it from the metadata reported by the file system. Microsoft Word and Microsoft Excel documents, typically contain embedded metadata such as when the document was first created on any computer, when it was last modified, or when it was last printed. Exhibit B also lists the embedded Created, Last Modified and Last Printed dates for Microsoft Office files when available. Stroz Friedberg analyzed the underlying files listed in Exhibit B and all of the files have file system and embedded metadata time stamps, in files that have embedded metadata, on or before September 8, 2017.

13. I have reviewed and analyzed the affidavit and findings of Michael Kunkel written on June 20, 2019. In paragraph 12 of Mr. Kunkel's affidavit, Mr. Kunkel stated "...numerous files connected with the case and/or client were modified and/or transferred on August 25, 2018." My analysis showed the vast majority of the files were located in a folder named "...\C\Users\toshiba\Desktop\Transfer." Furthermore, of the files in the folder named "...\C\Users\toshiba\Desktop\Transfer", all had file system Last Accessed, Created, and Last Modified times within a three minute time period spanning from 16:34:42 to 16:37:48 (UTC) on August 25, 2018. The file system Last Accessed, Created, and Last Modified dates represent the time the files appeared on external hard drive. The large number of files created in this short time span suggests a mass move or copy event.

14. In paragraph 15 of Mr. Kunkel's affidavit, Mr. Kunkel stated "...files placed in the "recycle bin" on August 25, 2018, were not recovered, and the contents are unknown." I have analyzed ES0007C and twenty-nine (29) non system created files were placed in the Recycle Bin on August 25, 2018. These files are recoverable and can be reviewed for analysis. None of the files in the Recycle Bin are files that were sent to Plaintiffs' experts as part of the Exhibit B spreadsheet.

Executed on: 1 July 2019



Jon G. Matthews

³ ES0004B is a Stroz Friedberg internal evidence number.

⁴ ES0007C is a Stroz Friedberg internal evidence number.

EXHIBIT A

Jon Matthews

Vice President Digital Forensics and Incident Response



+1 202.971.3972



jon.matthews@strozfriedberg.com



1150 Connecticut Avenue, NW,
Suite 700, Washington, DC 20036

PROFESSIONAL EXPERIENCE

Stroz Friedberg, an Aon Company

Vice President Digital Forensics and Incident Response, January 2019 to present
Washington, DC

Responsible for assisting with the management of the firm's technical operations in the areas of computer forensics, cybercrime response, incident handling, and electronic discovery. Supervises and conducts digital forensic acquisitions and analyses of laptops, desktops, servers, and mobile devices in civil litigation, criminal matters, and internal investigations. Conducts cybercrime investigations, including those related to malware, hacks, and exfiltration of data, data destruction and trade secret theft. Supervises and performs electronic discovery assignments for major law firms and Fortune 500 firms. Submits reports for computer forensic and cybercrime cases.

US Army

Digital Forensic Examiner/Cyber Crime Investigator, February 2017 to December 2019
Senior Instructor – CI/Cyber/Evidence/Investigations, November 2014 to January 2017
Digital Forensic Examiner/Cyber Crime Investigator, March 2010 to November 2014
Fort Meade, MD

Collected, processed, and documented hundreds of gigabytes of digital evidence in cyber CI investigations. Sustained CI national security espionage, cyber intrusion, insider threat, and international terrorism investigations. Conducted damage assessments encompassing all aspects of network, including end point devices, witness devices, Windows and Linux servers, firewalls, and other network appliances. Captured volatile data and analyze memory forensics, malware extractions, malicious process identification, and network connection analysis. Researched and analyzed adversarial network exploitation methodologies to detect, exploit, and neutralize adversary threats. Created policies and procedures for forensic equipment setup and use, digital forensic workstation standards, and report writing criteria. Collaborated with highly sensitive organizations while briefing leadership on findings and recommendations to avoid threats and manage security, authoring detailed intelligence reports covering cyber intrusion and forensic findings.

Designed and implemented training programs for Officers, Warrant Officers, and Military Intelligence Civilian Excepted Career Program (MICECP) personnel in CI investigations, military CI collections, surveillance, cyber, and evidence collection. Developed specialized training on application of legal principles and collection of digital evidence collected from hard drives, mobile devices, network logs, and witness devices, with a focus on handling, packaging, and shipping of digital media and classified material.

About: Aon's Cyber Solutions offers holistic cyber risk management, unsurpassed investigative skills, and proprietary technologies to help clients uncover and quantify cyber risks, protect critical assets, and recover from cyber incident.

Cyber security services offered by Stroz Friedberg Inc. and its affiliates. Insurance products and services offered by Aon Risk Insurance Services West, Inc., Aon Risk Services Central, Inc., Aon Risk Services Northeast, Inc., Aon Risk Services Southwest, Inc., and Aon Risk Services, Inc. of Florida and their licensed affiliates.

www.aon.com/cyber-solutions | © Aon plc 2019. All rights reserved.



EDUCATION

SANS Technology Institute

Graduate Certificate: Incident Response, October 2016

University of Maryland University College (UMUC)

B.S. Computer Networks Security, December 2015

Minor: Cybersecurity

Certificate: Computer Networking

Certifications

GASF, GIAC, June 2018

ACE, AccessData, April 2018

MCFE, Magnet Forensics, May 2017

GREM, GIAC, October 2016

GNFA, GIAC, April 2016

GCFA, GIAC, October 2015

GCIH, GIAC, June 2015

CISSP, ISC2, September 2015

CEH, EC Council, October 2013

DoD-Cyber Crime Investigator, Defense Cyber Investigations Training Academy, June 2012

DoD-Digital Forensic Examiner, Defense Cyber Investigations Training Academy, February 2011

DoD-Digital Media Collector, Defense Cyber Investigations Training Academy, December 2010

Training

Stroz Friedberg Internal Cyber Training Program; Participate in regular in-house training presentations on current digital forensics, cybercrime response, computer security, desktop, and network forensic tools in conjunction with relevant legal and industry matters.

Defense Cyber Investigations Training Academy; Conducted over 500 hours of formal cyber investigative training in Networks and Computer Hardware, Incident Response, Windows Forensic Examinations, Forensics and Intrusions in a Windows Environment, Network Monitoring, Advanced Forensics, Wireless Forensics, Malicious Code Analysis, and Live Network Forensics.

United States Army Counterintelligence Special Agent Course; Credentialed as a Special Agent of the United States Government.

Mac Forensic Analysis, SANS Institute, 2019

Advanced Smartphone Forensics, SANS Institute, 2018

Magnet AXIOM Examinations (AX200), Magnet Forensics, 2017

Reverse Engineering Malware, SANS Institute, 2016

Advanced Network Forensics, SANS Institute, 2016

Advanced Incident Response, Threat Hunting, and Digital Forensics, SANS Institute, 2015

Hacker Tools, Techniques, Exploits, and Incident Handling, SANS Institute, 2015

Forensic Toolkit v4, AccessData, 2011

Clearances

TS/SCI
Counterintelligence Polygraph

June 2019

EXHIBIT B

Files Reviewed and Relied Upon by the Plaintiffs' Experts

In The Common Cause Matter/Case No: 18-CVS-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselstyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
The Use of Citizen Voting Age Population in Redistricting.docx	docx	29,831	C:\PC Backup (Mar 8, 2016)\Documents\Toms Documents\TX House CVAP Study\The Use of Citizen Voting Age Population in Redistricting.docx	ES0004B	External HDD	NA7QGNQM	In blue silicone case, labeled "#1"	03/08/2016 08:31:19 PM	08/30/2015 09:18:58 PM	03/08/2016 08:31:19 PM	08/17/2015 08:55:00 AM	08/30/2015 09:18:00 PM	08/30/2015 09:18:00 PM	N/A	N/A	06/03/2019	06/03/2019
ccBlock.bin	bin	365,279,568	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:16 PM	03/28/2015 04:08:20 PM	03/28/2015 04:08:16 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccBlock.Bx	Bx	32,845,824	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:15 PM	03/28/2015 04:08:15 PM	03/28/2015 04:08:15 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccBlock.Bxl	Bxl	189	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:15 PM	03/28/2015 04:08:15 PM	03/28/2015 04:08:15 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccBlock.Cdf	Cdf	49,528,892	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:12 PM	03/28/2015 04:08:13 PM	03/28/2015 04:08:12 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
Chen	Cfs	5,940	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccBlock.DCB	DCB	64,132	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccBlock.Sty	Sty	19,074	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccBlock.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	03/28/2015 04:08:12 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.bin	bin	152,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\MPR data\N C2011\ccCounty.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

In The Common Cause Matter/Case No: 18-CV-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbryn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccCounty.Bx	Bx	9,216	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.Cdf	Cdf	433,498	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.Cfs	Cfs	5,968	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.DCB	DCB	60,946	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccCounty.Sty	Sty	19,137	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccCounty.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.Bin	Bin	1,217,420	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	03/28/2015 04:08:11 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.Bx	Bx	345,088	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.Bxl	Bxl	3,503	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

In The Common Cause Matter/Case No: 18-CVS-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccLandmark.Cdf	Cdf	172,521	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.Dcb	Dcb	386	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Dcb	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.S10	S10	4,630	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.S10	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccLandmark.Sty	Sty	42,738	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccLandmark.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.bin	bin	990,260	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccPlace.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.Bx	Bx	62,976	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccPlace.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccPlace.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.Cdf	Cdf	1,618,012	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccPlace.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.Cfs	Cfs	5,964	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccPlace.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

In The Common Cause Matter/Case No: 18-CV-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbryn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccPlace.DCB	DCB	60,460	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccPlace.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.SI2	SI2	1,035	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccPlace.SI2	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccPlace.Sty	Sty	19,164	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccPlace.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	03/28/2015 04:08:10 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Bin	Bin	73,320	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Bx	Bx	5,120	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Cdf	Cdf	728,682	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Cfs	Cfs	5,976	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Dcb	Dcb	52,280	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Dcb	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStateHouse.Sty	Sty	19,181	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStateHouse.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	03/28/2015 04:08:07 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccStreet.Cdf	Cdf	44,825,841	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStreet.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStreet.Cdn	Cdn	2,560,853	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStreet.Cdn	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStreet.St1	St1	5,033	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStreet.St1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccStreet.Sty	Sty	995	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccStreet.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	03/28/2015 04:08:05 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccUnifiedSchool.Bin	Bin	80,712	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccUnifiedSchool.Bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccUnifiedSchool.Bx	Bx	11,264	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccUnifiedSchool.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccUnifiedSchool.Cdf	Cdf	522,232	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccUnifiedSchool.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccUnifiedSchool.Cfs	Cfs	5,984	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccUnifiedSchool.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccUnifiedSchool.Dcb	Dcb	52,259	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba (Backup)\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_ Toshiba\C\MPR data\N C2011\ccUnifiedSchool.Dcb	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccUnifiedSchool.Sty	Sty	18,948	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccUnifiedSchool.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.bin	bin	3,599,204	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.Bx	Bx	110,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	03/28/2015 04:07:40 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.Cdf	Cdf	3,294,660	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.Cfs	Cfs	5,956	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.DCB	DCB	61,188	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccVotingDistrict.Sty	Sty	19,109	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccVotingDistrict.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.bin	bin	1,434,816	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccWaterArea.Bx	Bx	446,464	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.Bxl	Bxl	3,503	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.Cdf	Cdf	7,972,450	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.DCB	DCB	440	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.SI2	SI2	354	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.SI2	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
ccWaterArea.Sty	Sty	5,543	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\ccWaterArea.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
Hselncumbent.bin	bin	11,760	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Hselncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
Hselncumbent.cdf	cdf	5,721	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Hselncumbent.cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
Hselncumbent.DCB	DCB	468	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Hselncumbent.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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Hselncumbent.sty	sty	1,021	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Hselncumbent.sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	03/28/2015 04:07:39 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
nc2011hds_july12s amps_on_etc.bin	bin	123,088	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Samps_on_etc\nc2011hds_july12s amps_on_etc.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
nc2011hds_july12s amps_on_etc.cdf	cdf	889,028	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Samps_on_etc\nc2011hds_july12s amps_on_etc.cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
nc2011hds_july12s amps_on_etc.DCB	DCB	7,264	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Samps_on_etc\nc2011hds_july12s amps_on_etc.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
nc2011hds_july12s amps_on_etc.sty	sty	97,407	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\Samps_on_etc\nc2011hds_july12s amps_on_etc.sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	03/28/2015 04:08:34 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
SenIncumbent.bin	bin	5,000	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\SenIncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
SenIncumbent.cdf	cdf	4,881	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\SenIncumbent.cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
SenIncumbent.DCB	DCB	519	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\SenIncumbent.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
SenIncumbent.sty	sty	1,018	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR data\N C2011\SenIncumbent.sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	03/28/2015 04:07:37 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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NC.rdl	rdl	20,311	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NC.rdl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:19:57 PM	03/28/2015 03:19:57 PM	03/28/2015 03:19:57 PM	N/A	N/A	N/A	04/27/2019	N/A	N/A	N/A
NC House Master July 18 1200001.bak.zip	zip	3,789,352	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:35:28 PM	3/28/2015 3:35:28 PM (Files extracted from the zip have Last Modified dates in July 2011)	03/28/2015 03:35:28 PM	N/A	N/A	N/A	04/17/2019	05/14/2019	05/14/2019	N/A
NC House Master July 18 1200.bdr	bdr	117,760	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time one not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.bin	bin	18,056	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:07:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.bmp	bmp	88,374	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 04:13:54 PM (time one not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_tsoshiba\C\MRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:59:44 AM (time one not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC House Master July 18 1200.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.DCB	DCB	1,094	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.ds.c	ds.c	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.ds.c	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:50:06 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC House Master July 18 1200.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:50:06 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.lok	lok	45,056	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.map	map	313,596	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 04:13:54 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:50:06 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.pts	pts	7,519,976	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.ro	ro	89,088	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.ro	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC House Master July 18 1200.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200.ndp	ndp	3,444	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200.ndp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 04:13:54 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:04:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMPRwork\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 12000001.bak.zip\ZIP Volume\NC House Master July 18 1200ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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In The Common Cause Matter/Case No: 18-CV-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

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NC House Master July 18 1200vLbin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200vLbin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/21/11 03:02:18 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House Master July 18 1200vLDCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip\ZIP Volume\NC House Master July 18 1200vLDCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/18/11 11:37:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC House w New Raleigh - June 28005.bak.zip	zip	3,624,928	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:35:02 PM	3/28/2015 3:35:02 PM (Files extracted from the zip have Last Modified dates in June 2011)	03/28/2015 03:35:02 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House w New Raleigh - June 28ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28ctLbin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28ctLbin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A

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NC House w New Raleigh - June 28.vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:39:56 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.rdp	rdp	2,796	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/30/11 02:00:30 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.bmp	bmp	88,854	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/30/11 02:00:30 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.map	map	280,409	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/30/11 02:00:30 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A

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NC House w New Raleigh - June 28.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.DCB	DCB	645	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.bin	bin	13,664	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:45:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.pts	pts	6,747,608	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip\ZIP Volume\NC House w New Raleigh - June 28.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A

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NC House w New Raleigh - June 28.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:06:04 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.bdr	bdr	108,544	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.r0	r0	81,920	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/29/11 09:40:12 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A

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NC House w New Raleigh - June 28.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House w New Raleigh - June 28.ds.c	ds.c	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse w New Raleigh - June 28 Backups\NCHouse w New Raleigh - June 28005.bak.zip\ZIP Volume\NCHouse w New Raleigh - June 28.ds.c	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/11 12:02:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.bdr	bdr	122,880	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.bin	bin	16,482	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.bmp	bmp	112,374	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NCHouse with Pitt Wils on Pod July 4.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.DCB	DCB	1,007	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.gpp	gpp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.gpp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NCHouse with Pitt Wils on Pod July 4.lok	lok	48,128	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4c2-a86b-ea77894bb5b2\20150328_151333_toshiba\CMR\work\NCP\ans\NCHouse with Pitt Wils on Pod July 4.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC House with Pitt Wils on Pod July 4.map	map	296,483	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.pts	pts	9,112,296	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.r0	r0	93,184	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4.rdp	rdp	3,293	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:51 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:51 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MRR work\NCPians\NC House with Pitt Wils on Pod July 4bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC House with Pitt Wils on Pod July 4c.t.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House with Pitt Wils on Pod July 4c.t.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4c.t.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House with Pitt Wils on Pod July 4c.t.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4v.t.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House with Pitt Wils on Pod July 4v.t.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC House with Pitt Wils on Pod July 4v.t.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC House with Pitt Wils on Pod July 4v.t.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	03/28/2015 03:30:50 PM	N/A	N/A	N/A	04/17/2019	N/A	N/A	N/A
NC Senate Master July 11 0115001.bak.zip	zip	1,342,588	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/28/2015 03:34:23 PM	3/28/2015 3:34:23 PM (Files extracted from the zip have a Last Modified date in July 2011)	03/28/2015 03:34:23 PM	N/A	N/A	N/A	04/17/2019	05/14/2019	05/14/2019	N/A
NC Senate Master July 11 0115.bdr	bdr	57,344	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.bin	bin	6,400	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate Master July 11 0115.bmp	bmp	76,854	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:19:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.DCB	DCB	818	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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In The Common Cause Matter/Case No: 18-CVS-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC Senate Master July 11 0115.ds.c	ds.c	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.ds.c	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.ds.k	ds.k	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.ds.k	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.gpp	gpp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.gpp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.lok	lok	21,504	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.map	map	259,443	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:19:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.pnk	pnk	4,096	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate Master July 11 0115.ppt	ppt	2,156,352	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.ppt	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.o	o	43,008	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.o	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.r1	r1	6,144	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115.rdp	rdp	2,963	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:19:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA- PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate Master July 11 0115c1.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115c1.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115c1.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115c1.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate Master July 11 0115vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150328_151333_toshiba\C\MPR work\NCP\Plans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip\ZIP Volume\NC Senate Master July 11 0115vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/11/11 1:13:24 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/17/2019*	05/14/2019*	05/14/2019*	N/A
ccPlace.Cfs	Cfs	5,964	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150618_173717_toshibainc\516\C\MPRdata\NC2011\ccPlace.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/19/2015 09:35:35 AM	06/19/2015 09:35:35 AM	06/19/2015 09:35:35 AM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccPlace.bin	bin	1,223,784	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150619_095133_toshibainc\517\C\MPRdata\NC2011\ccPlace.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/19/2015 09:51:53 AM	06/19/2015 09:51:53 AM	06/19/2015 09:51:53 AM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccPlace.Bx	Bx	62,976	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20150619_095133_toshibainc\517\C\MPRdata\NC2011\ccPlace.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/19/2015 09:51:53 AM	06/19/2015 09:51:53 AM	06/19/2015 09:51:53 AM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccPlace.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ Toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20151101_124418_toshibainc\822\C\MPRdata\NC2011\ccPlace.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A

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ccPlace.S12	S12	1,035	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20151101_124418_toshibainc.822\C\MRData\NC2011\ccPlace.S12	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccPlace.Sty	Sty	19,164	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20151101_124418_toshibainc.822\C\MRData\NC2011\ccPlace.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	11/01/2015 01:39:15 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS.docx	docx	10,403	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161025_151544_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS.docx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	12/01/2016 09:54:08 AM	12/01/2016 09:54:08 AM	12/01/2016 09:54:08 AM	11/07/2016 01:07:00 PM	11/07/2016 02:36:00 PM	N/A	04/17/2019	05/20/2019	05/20/2019	N/A
House Minimum-Partisan-Members.xlsx	xlsx	18,182	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161025_151544_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\House Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	12/01/2016 09:54:08 AM	12/01/2016 09:54:08 AM	12/01/2016 09:54:08 AM	11/21/2016 10:42:45 AM	11/24/2016 12:21:54 PM	11/24/2016 10:22:02 AM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members.xlsx	xlsx	13,709	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161025_151544_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\Senate Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	12/01/2016 09:54:04 AM	12/01/2016 09:54:04 AM	12/01/2016 09:54:04 AM	11/21/2016 10:42:45 AM	11/26/2016 12:44:12 PM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum Renumbered.xls	xls	61,952	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161201_112948_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\House Minimum Renumbered.xls	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	N/A	12/3/2016 02:42:30 PM (time zone not determined)	N/A	04/17/2019	05/22/2019	05/22/2019	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,165	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161201_112948_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	11/21/2016 10:42:45 AM	12/06/2016 07:39:07 PM	12/06/2016 07:37:45 PM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members.xlsx	xlsx	24,246	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20161201_112948_toshibainc.1350\C\Users\tsoshiba\Documents\Tom\2017 Redistricting\House Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	11/21/2016 10:42:45 AM	12/03/2016 12:47:37 PM	12/03/2016 12:36:46 PM	04/17/2019	05/14/2019	05/14/2019	N/A

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Johnston Senate Switch.xlsx	xlsx	10,018	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20161201_112948_toshibainc1350 \CUsers\toshiba\Documents\Tom\NC 2017 Redistricting\Johnston Senate Switch.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	01/03/2017 04:46:33 PM	12/10/2016 03:18:10 PM	12/11/2016 04:49:26 PM	N/A	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,165	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170105_164443_toshibainc1385 \CUsers\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/05/2017 04:48:03 PM	01/05/2017 04:48:03 PM	01/05/2017 04:48:03 PM	11/21/2016 10:42:45 AM	12/06/2016 07:39:07 PM	12/06/2016 07:37:45 PM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members.xlsx	xlsx	24,246	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170105_164443_toshibainc1385 \CUsers\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan- Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/05/2017 04:48:03 PM	01/05/2017 04:48:03 PM	01/05/2017 04:48:03 PM	11/21/2016 10:42:45 AM	12/03/2016 12:47:37 PM	12/03/2016 12:36:46 PM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members.xlsx	xlsx	13,709	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170105_164443_toshibainc1385 \CUsers\toshiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan- Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	01/05/2017 04:47:59 PM	01/05/2017 04:47:59 PM	01/05/2017 04:47:59 PM	11/21/2016 10:42:45 AM	11/26/2016 12:44:12 PM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A
ccBlock.Bxl	Bxl	189	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibainc1861 \C\MPRdata\NC2011\ccBlock.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:52 PM	03/12/2017 12:24:52 PM	03/12/2017 12:24:52 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlock.Cdf	Cdf	49,528,892	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibainc1861 \C\MPRdata\NC2011\ccBlock.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:50 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlock.Sty	Sty	19,074	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibainc1861 \C\MPRdata\NC2011\ccBlock.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlockGroup.bin	bin	6,511,990	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibainc1861 \C\MPRdata\NC2011\ccBlockGroup.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
ccBlockGroup.Bx	Bx	331,776	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccBlockGroup.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlockGroup.Cdf	Cdf	5,206,426	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccBlockGroup.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlockGroup.Cfs	Cfs	5,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccBlockGroup.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlockGroup.DCB	DCB	60,732	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccBlockGroup.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlockGroup.Sty	Sty	19,118	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccBlockGroup.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	03/12/2017 12:24:49 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccCounty.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.Cdf	Cdf	433,498	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccCounty.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.Cfs	Cfs	5,968	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccCounty.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.DCB	DCB	65,442	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccCounty.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.Sty	Sty	19,137	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibainc.1861\C\MPRdata\N C2011\ccCounty.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	03/12/2017 12:24:48 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A

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ccPlace.Cdf	Cdf	1,618,012	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccPlace.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:47 PM	03/12/2017 12:24:47 PM	03/12/2017 12:24:47 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccPlace.DCB	DCB	63,188	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccPlace.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:46 PM	03/12/2017 12:24:46 PM	03/12/2017 12:24:46 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.Bxl	Bxl	2,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccVotingDistrict.Bxl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.Cdf	Cdf	3,294,660	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccVotingDistrict.Cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.Cfs	Cfs	5,956	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccVotingDistrict.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.DCB	DCB	65,684	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccVotingDistrict.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.Sty	Sty	19,109	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\ccVotingDistrict.Sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	03/12/2017 12:24:19 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
Hselncumbent.bin	bin	11,760	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\Hselncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
Hselncumbent.cdf	cdf	5,721	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\Hselncumbent.cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
Hselncumbent.DCB	DCB	468	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc.1861 \C:\MPRdata\N C2011\Hselncumbent.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A

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HseIncumbent.sty	sty	1,021	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\N C2011\HseIncumbent.sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	03/12/2017 12:24:18 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
SenIncumbent.bin	bin	5,000	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\N C2011\SenIncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
SenIncumbent.cdf	cdf	4,881	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\N C2011\SenIncumbent.cdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
SenIncumbent.DCB	DCB	519	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\N C2011\SenIncumbent.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
SenIncumbent.sty	sty	1,018	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\N C2011\SenIncumbent.sty	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
memes_House_20161116_generalized_SPMCPG	CPG	5	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\New Members 2017\House 2017\memes_House_20161116_generalized_SPMCPG	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memes_House_20161116_generalized_SPMpj	pj	523	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\New Members 2017\House 2017\memes_House_20161116_generalized_SPMpj	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memes_House_20161116_generalized_SPMsbn	sbn	1,252	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\New Members 2017\House 2017\memes_House_20161116_generalized_SPMsbn	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memes_House_20161116_generalized_SPMsxb	sxb	172	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\MPRdata\New Members 2017\House 2017\memes_House_20161116_generalized_SPMsxb	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A

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memmes_House_20161116_generalized_SPMshp.xml	xml	19,365	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\House 2017\memmes_House_20161116_generalized_SP Mshp.xml	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPMCPG	CPG	5	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.CPG	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPMpj	pdf	523	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.pj	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPMsbn	sbn	604	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.sbn	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPMsxb	sxb	148	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.sxb	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPMshp.xml	xml	9,746	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP Mshp.xml	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	03/12/2017 12:24:15 PM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,165	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170312_111826_toshibalnc1861 \C:\Users\tsoshiba\Documents\Tom, N C 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 11:25:59 AM	03/12/2017 11:25:59 AM	03/12/2017 11:25:59 AM	11/21/2016 10:42:45 AM	12/06/2016 07:39:07 PM	12/06/2016 07:37:45 PM	04/17/2019	05/14/2019	05/14/2019	N/A

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House Minimum-Partisan-Members.xlsx	xlsx	24,246	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 11:25:58 AM	03/12/2017 11:25:58 AM	03/12/2017 11:25:58 AM	11/21/2016 10:42:45 AM	12/03/2016 12:47:37 PM	12/03/2016 12:36:46 PM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members.xlsx	xlsx	13,709	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170312_111826_toshibalnc1861\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	03/12/2017 11:25:54 AM	03/12/2017 11:25:54 AM	03/12/2017 11:25:54 AM	11/21/2016 10:42:45 AM	11/26/2016 12:44:12 PM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,230	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170531_084929_toshibalnc2210\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	05/31/2017 08:49:51 AM	05/31/2017 08:49:51 AM	05/31/2017 08:49:51 AM	11/21/2016 10:42:45 AM	05/31/2017 08:35:00 AM	12/06/2016 07:37:45 PM	04/17/2019	05/14/2019	05/14/2019	N/A
NC House Plan June 7.xls	xls	62,976	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170607_152743_toshibalnc2347\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC House Plan June 7.xls	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/07/2017 03:28:05 PM	06/07/2017 03:28:05 PM	06/07/2017 03:28:05 PM	N/A	6/7/2017 07:17:15 PM (time zone not determined)	N/A	04/17/2019	05/22/2019	05/22/2019	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,854	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170608_095810_toshibalnc2357\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/08/2017 09:58:32 AM	06/08/2017 09:58:32 AM	06/08/2017 09:58:32 AM	11/21/2016 10:42:45 AM	06/08/2017 09:50:07 AM	06/08/2017 09:20:33 AM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members D.xlsx	xlsx	25,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170612_230105_toshibalnc2436\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/12/2017 11:01:27 PM	06/12/2017 11:01:27 PM	06/12/2017 11:01:27 PM	11/21/2016 10:42:45 AM	06/12/2017 03:49:26 PM	06/08/2017 09:20:33 AM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members.xlsx	xlsx	24,269	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170612_230105_toshibalnc2436\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/12/2017 11:01:27 PM	06/12/2017 11:01:27 PM	06/12/2017 11:01:27 PM	11/21/2016 10:42:45 AM	06/12/2017 10:55:12 PM	12/03/2016 12:36:46 PM	04/17/2019	05/14/2019	05/14/2019	N/A

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House Minimum-Partisan-Members D.xlsx	xlsx	25,706	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170613_101639_toshibainc2441 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/13/2017 10:17:01 AM	06/13/2017 10:17:01 AM	06/13/2017 10:17:01 AM	11/21/2016 10:42:45 AM	06/12/2017 03:49:26 PM	06/08/2017 09:20:33 AM	04/17/2019	05/14/2019	05/14/2019	N/A
House Minimum-Partisan-Members J-2.xlsx	xlsx	26,599	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170613_101639_toshibainc2441 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members J- 2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/13/2017 10:17:01 AM	06/13/2017 10:17:01 AM	06/13/2017 10:17:01 AM	11/21/2016 10:42:45 AM	06/13/2017 10:10:50 AM	06/13/2017 10:07:14 AM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members.xlsx	xlsx	13,709	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170613_103309_toshibainc2442 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan- Members.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/13/2017 10:33:31 AM	06/13/2017 10:33:31 AM	06/13/2017 10:33:31 AM	11/21/2016 10:42:45 AM	11/26/2016 12:44:12 PM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members J-2.xlsx	xlsx	15,028	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170613_104847_toshibainc2443 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members J- 2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/13/2017 10:49:09 AM	06/13/2017 10:49:09 AM	06/13/2017 10:49:09 AM	11/21/2016 10:42:45 AM	06/13/2017 10:28:49 AM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A
NC Senate Minimum-Partisan J-2.xlsx	xlsx	18,598	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170613_171944_toshibainc2453 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\NC Senate Minimum-Partisan J-2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/13/2017 05:20:06 PM	06/13/2017 05:20:06 PM	06/13/2017 05:20:06 PM	11/21/2016 10:42:45 AM	06/13/2017 05:15:03 PM	06/13/2017 04:59:52 PM	04/17/2019	05/22/2019	05/22/2019	N/A
House Minimum-Partisan-Members J-2.xlsx	xlsx	26,593	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170615_103911_toshibainc2461 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members J- 2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/15/2017 10:39:40 AM	06/15/2017 10:39:40 AM	06/15/2017 10:39:40 AM	11/21/2016 10:42:45 AM	06/14/2017 09:52:01 AM	06/13/2017 10:07:14 AM	04/17/2019	05/14/2019	05/14/2019	N/A
Senate Minimum-Partisan-Members J-2.xlsx	xlsx	15,028	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170615_103911_toshibainc2461 \C:\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members J- 2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/15/2017 10:39:40 AM	06/15/2017 10:39:40 AM	06/15/2017 10:39:40 AM	11/21/2016 10:42:45 AM	06/13/2017 10:28:49 AM	11/26/2016 10:46:10 AM	04/17/2019	05/14/2019	05/14/2019	N/A

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Hous e Minimum-Partisan-Members J-2.xlsx	xlsx	26,593	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170618_062153_toshibainc2502\C\Users\ Toshiba\Documents\Tom\NC 2017 Redistricting\Hous e Minimum-Partisan-Members J-2.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/18/2017 06:22:13 AM	06/18/2017 06:22:13 AM	06/18/2017 06:22:13 AM	11/21/2016 10:42:45 AM	06/14/2017 09:52:01 AM	06/13/2017 10:07:14 AM	04/17/2019	05/14/2019	05/14/2019	N/A
Hselncumbent.bin	bin	10,320	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_195750_toshibainc2502\C\MPRdata\NC2011\Incumbents-NCG A-ISD\Hselncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 07:58:38 PM	06/20/2017 07:58:38 PM	06/20/2017 07:58:38 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
ccBlock.bin	bin	559,478,832	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccBlock.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:14 PM	06/20/2017 08:33:14 PM	06/20/2017 08:33:14 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlock.Bx	Bx	32,845,824	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccBlock.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlock.Cfs	Cfs	5,940	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccBlock.Cfs	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccBlock.DCB	DCB	68,865	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccBlock.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.bin	bin	216,400	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccCounty.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	06/20/2017 08:33:13 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccCounty.Bx	Bx	9,216	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccCounty.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
ccVotingDistrict.bin	bin	5,311,316	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170620_203251_toshibainc2542\C\MPRdata\NC2011\ccVotingDistrict.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A

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ccVotingDistrict.Bx	Bx	110,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170620_203251_toshibalnc2542 \C:\MPRdata\NC2011\ccVotingDistrict.Bx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	06/20/2017 08:33:12 PM	N/A	N/A	N/A	05/21/2019	N/A	N/A	N/A
SenIncumbent.bin	bin	4,300	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170620_203251_toshibalnc2542 \C:\MPRdata\NC2011\Incumbents-NCGA- ISD\SenIncumbent.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/20/2017 08:33:37 PM	06/20/2017 08:33:37 PM	06/20/2017 08:33:37 PM	N/A	N/A	N/A	05/22/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPM.dbf	dbf	5,008	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalnc2590 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.dbf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPM.shp	shp	1,500	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalnc2590 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.shp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_Senate_20161109_generalized_SPM.shx	shx	500	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalnc2590 \C:\MPRdata\New Members 2017\Senate 2017\memmes_Senate_20161109_generalized_SP M.shx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
NC Senate J-24001.bak.zip	zip	3,930,007	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalnc2590 \C:\MPRwork\NCP\plans\NC Senate J-24 Backups\NC Senate J24001.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	06/24/2017 09:39:58 AM	N/A	N/A	N/A	05/14/2019	05/14/2019	05/14/2019	N/A
NC Senate J-24.bdr	bdr	46,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalnc2590 \C:\MPRwork\NCP\plans\NC Senate J-24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J-24.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jewel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC Senate J24.bin	bin	14,469	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.bmp	bmp	89,334	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.DCB	DCB	2,081	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_tsoshibainc2590\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24001.bak.zip\ZIP Volume\NC Senate J24.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate J24.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.gip	gip	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.gip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.lok	lok	19,456	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.map	map	253,916	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.pnk	pnk	4,096	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:23:56 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J24.pts	pts	7,553,864	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\CMRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate J-24.r0	r0	35,840	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24.r1	r1	7,168	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24.rdp	rdp	3,688	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:24:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibainc2590\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A

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NC Senate J-24vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalinc2590 \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170624_093938_toshibalinc2590 \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip\ZIP Volume\NC Senate J-24vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	05/14/2019*	05/14/2019*	05/14/2019*	N/A
PPI Indicator Votes for New 2017 Legislative Districts.xlsx	xlsx	13,784	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170627_100447_toshibalinc2638 \C:\Users\toshiba\Documents\Tom\NC 2017 Redistricting\PPi Indicator Votes for New 2017 Legislative Districts.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/24/2017 12:12:06 PM	06/24/2017 12:12:06 PM	06/24/2017 12:12:06 PM	06/24/2017 11:18:40 AM	06/24/2017 12:06:34 PM	06/24/2017 12:05:19 PM	04/17/2019	05/22/2019	05/22/2019	N/A
memmes_House_20161116_generalized_SPM.dbf	dbf	11,658	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170627_100447_toshibalinc2638 \C:\MPRdata\New Members 2017\House 2017\memmes_House_20161116_generalized_SP M.dbf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_House_20161116_generalized_SPM.shp	shp	3,460	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170627_100447_toshibalinc2638 \C:\MPRdata\New Members 2017\House 2017\memmes_House_20161116_generalized_SP M.shp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
memmes_House_20161116_generalized_SPM.shx	shx	1,060	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170627_100447_toshibalinc2638 \C:\MPRdata\New Members 2017\House 2017\memmes_House_20161116_generalized_SP M.shx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	06/27/2017 10:05:09 AM	N/A	N/A	N/A	05/10/2019	N/A	N/A	N/A
NC House J-25003.bak.zip	zip	10,058,189	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170628_120524_toshibalinc2724 \C:\MPRwork\NCPPlans\NC House J-25 Backups\NC House J-25003.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/28/2017 12:05:45 PM	06/28/2017 12:05:45 PM	06/28/2017 12:05:45 PM	N/A	N/A	N/A	04/28/2019	05/14/2019	05/14/2019	N/A

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Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jewel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC House J25.bdr	bdr	101,376	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.bin	bin	43,318	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:44:34 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.bmp	bmp	81,654	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/17 12:04:38 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

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NC House J25.DCB	DCB	1,775	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.map	map	596,179	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/17 12:04:38 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibainc2724\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:33:28 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A

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NC House J25.pts	pts	19,525,328	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:06 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.i0	i0	76,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.i0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25.ndp	ndp	3,458	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.ndp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/28/17 12:04:38 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J-25bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J-25bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J-25bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J-25bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J25ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C:\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A

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NC House J-25ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J-25vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:41:08 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC House J-25vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibalnc2724\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	05/14/2019*	05/14/2019*	N/A
NC Senate J-24003.bak.zip	zip	4,064,314	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NCSenate J-24 Backups\NCSenate J-24003.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/05/2017 01:04:01 PM	07/05/2017 01:04:01 PM	07/05/2017 01:04:01 PM	N/A	N/A	N/A	06/04/2019	06/04/2019	N/A	N/A
NC Senate J-24.bdr	bdr	46,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NCSenate J-24 Backups\NCSenate J-24003.bak.zip\ZIP Volume\NCSenate J-24.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24.bin	bin	14,469	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NCSenate J-24 Backups\NCSenate J-24003.bak.zip\ZIP Volume\NCSenate J-24.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24.bmp	bmp	89,814	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NCSenate J-24 Backups\NCSenate J-24003.bak.zip\ZIP Volume\NCSenate J-24.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/02/17 02:43:28 PM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J24.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.DCB	DCB	2,081	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J24 Backups\NC Senate J24003.bak.zip\ZIP Volume\NC Senate J24.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC Senate J24.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.lok	lok	19,456	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.map	map	374,051	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/02/17 02:43:28 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.pnk	pnk	4,096	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:23:56 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.pts	pts	7,553,864	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.ro	ro	35,840	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J24.ro	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.r1	r1	7,168	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J-24.rdp	rdp	3,688	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/02/17 02:43:28 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:24:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip\ZIP Volume\NC Senate J-24vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC House CCNC PPL.xlsx	xlsx	21,676	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC House CCNC PPL.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/05/2017 01:03:55 PM	07/05/2017 01:03:55 PM	07/05/2017 01:03:55 PM	07/02/2017 02:00:17 PM	07/04/2017 11:15:38 AM	07/04/2017 10:54:01 AM	04/17/2019	05/14/2019	05/14/2019	N/A
NC House CCNC Sample Plan - June 2017.xls	xls	56,320	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibalnc2731\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC House CCNC Sample Plan - June 2017.xls	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/05/2017 01:03:55 PM	07/05/2017 01:03:55 PM	07/05/2017 01:03:55 PM	N/A	7/4/2017 03:15:47 PM (time zone not determined)	N/A	04/17/2019	05/14/2019	05/14/2019	N/A
NC Senate CCNC PPL.xlsx	xlsx	17,941	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170708_200016_toshibalnc2756\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC Senate CCNC PPL.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/08/2017 08:00:37 PM	07/08/2017 08:00:37 PM	07/08/2017 08:00:37 PM	07/08/2017 12:25:02 PM	07/08/2017 07:45:53 PM	07/08/2017 07:45:22 PM	04/17/2019	05/14/2019	05/14/2019	N/A
NC Senate J-24005.bak.zip	zip	4,009,383	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/12/2017 03:14:12 PM	07/12/2017 03:14:12 PM	07/12/2017 03:14:12 PM	N/A	N/A	N/A	06/04/2019	06/04/2019	N/A	N/A
NC Senate J-24.bdr	bdr	46,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24.bin	bin	14,469	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:32:44 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24.bmp	bmp	90,294	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\C\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/12/17 03:02:10 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J24.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.DCB	DCB	2,081	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J24.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.lok	lok	19,456	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.map	map	324,864	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/12/17 03:02:10 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.pnk	pnk	4,096	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:23:56 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.pts	pts	7,553,864	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.ro	ro	35,840	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J24.ro	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24.r1	r1	7,168	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCPPlans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J24.rdp	rdp	3,691	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/12/17 03:02:10 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:24:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24ctt.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24ctt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J24vtl.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J24vtl.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 09:30:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-24vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibalnc2792\ \C:\MPRwork\NCP\Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip\ZIP Volume\NC Senate J-24vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 08:50:08 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate CCNC PPL.xlsx	xlsx	17,377	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170712_151351_toshibainc\2792 \C\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\NC Senate CCNC PPL.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/12/2017 03:14:12 PM	07/12/2017 03:14:12 PM	07/12/2017 03:14:12 PM	07/08/2017 12:25:02 PM	07/12/2017 03:01:53 PM	07/12/2017 01:42:37 PM	04/17/2019	05/14/2019	05/14/2019	N/A
NC House CCNC PPL.xlsx	xlsx	21,676	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170720_100441_toshibainc\2836 \C\Users\ts\hiba\Documents\Tom\NC 2017 Redistricting\NC House CCNC PPL.xlsx	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/20/2017 10:05:01 AM	07/20/2017 10:05:01 AM	07/20/2017 10:05:01 AM	07/02/2017 02:00:17 PM	07/04/2017 11:15:38 AM	07/04/2017 10:54:01 AM	04/17/2019	05/14/2019	05/14/2019	N/A
NC House J-25003.bak.zip	zip	10,098,898	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170807_211230_toshibainc\3011 \C\MPRwork\NCP\Plans\NC House J-25 Backups\NC House J-25003.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	08/07/2017 09:12:51 PM	08/07/2017 09:12:51 PM	08/07/2017 09:12:51 PM	N/A	N/A	N/A	04/28/2019	06/04/2019	N/A	N/A
NC House J-25.bdr	bdr	101,376	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170807_211230_toshibainc\3011 \C\MPRwork\NCP\Plans\NC House J-25 Backups\NC House J-25003.bak.zip\ZIP Volume\NC House J-25.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.bin	bin	43,560	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170807_211230_toshibainc\3011 \C\MPRwork\NCP\Plans\NC House J-25 Backups\NC House J-25003.bak.zip\ZIP Volume\NC House J-25.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:38:08 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.bmp	bmp	89,334	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170807_211230_toshibainc\3011 \C\MPRwork\NCP\Plans\NC House J-25 Backups\NC House J-25003.bak.zip\ZIP Volume\NC House J-25.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/07/17 08:59:12 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170807_211230_toshibainc\3011 \C\MPRwork\NCP\Plans\NC House J-25 Backups\NC House J-25003.bak.zip\ZIP Volume\NC House J-25.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:59:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J25.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.DCB	DCB	1,775	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.gpp	gpp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tshiba\nc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.gpp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J25.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.map	map	273,462	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/07/17 08:59:12 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.pts	pts	20,374,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:16 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.ro	ro	76,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.ro	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.rdp	rdp	3,453	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_tsoshibalnc3011\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/07/17 08:59:12 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J-25bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:16 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibainc3011\C\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1001.bak.zip	zip	9,341,546	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	08/11/2017 08:40:11 AM	08/11/2017 08:40:11 AM	08/11/2017 08:40:11 AM	N/A	N/A	N/A	04/28/2019	06/04/2019	N/A	N/A

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NC House A-1.bdr	bdr	101,376	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.bin	bin	43,076	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.bmp	bmp	95,574	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/11/17 08:24:02 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House A-1.DCB	DCB	1,775	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.gip	gip	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.gip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.map	map	244,842	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/11/17 08:24:02 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibainc3039\Volume\NC House A-1.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House A-1.pts	pts	18,524,560	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:30 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.r0	r0	76,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1.rdp	rdp	3,461	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/11/17 08:24:02 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts_hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_ts_hiba\nc3039\C\MPRwork\NCP\Plans\NCHouse A-1 Backups\NCHouse A-1001.bak.zip\ZIP Volume\NCHouse A-1ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House A-1ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\CMRwork\NCP\Plans\NC House A-1 Backups\NC House A-1001.bak.zip\ZIP Volume\NC House A-1ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\CMRwork\NCP\Plans\NC House A-1 Backups\NC House A-1001.bak.zip\ZIP Volume\NC House A-1vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House A-1vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_tshiba\nc3039\CMRwork\NCP\Plans\NC House A-1 Backups\NC House A-1001.bak.zip\ZIP Volume\NC House A-1vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/22/17 09:14:28 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC Senate J-23005.bak.zip	zip	3,994,272	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tshiba\nc3047\CMRwork\NCP\Plans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	08/13/2017 05:27:42 PM	08/13/2017 05:27:42 PM	08/13/2017 05:27:42 PM	N/A	N/A	N/A	06/04/2019	06/04/2019	N/A	N/A
NC Senate J-23.bdr	bdr	46,080	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tshiba\nc3047\CMRwork\NCP\Plans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23.bin	bin	14,469	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tshiba\nc3047\CMRwork\NCP\Plans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:47:54 AM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23.bmp	bmp	92,694	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tshiba\nc3047\CMRwork\NCP\Plans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/13/17 05:26:36 PM (time one not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC Senate J23.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.DCB	DCB	2,081	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J23.gpp	gpp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J-23.gpp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.lok	lok	19,456	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J-23.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.map	map	415,925	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J-23.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/13/17 05:26:36 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.pnk	pnk	4,096	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J-23.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:55:06 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.pts	pts	7,288,456	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J-23.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.ro	ro	35,840	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.ro	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J23.r1	r1	7,168	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J23005.bak.zip\ZIP Volume\NC Senate J23.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC Senate J-23.rdp	rdp	3,629	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/13/17 05:26:36 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:46:16 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/24/17 07:44:28 AM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A
NC Senate J-23vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_tsoshibalnc3047\C\MPRwork\NCPPlans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip\ZIP Volume\NC Senate J-23vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/23/17 03:01:32 PM (time zone not determined)	N/A	N/A	N/A	N/A	06/4/2019*	06/4/2019*	N/A	N/A

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NC House J-25003.bak.zip	zip	10,084,432	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	08/14/2017 07:19:52 AM	08/14/2017 07:19:53 AM	08/14/2017 07:19:52 AM	N/A	N/A	N/A	04/28/2019	06/04/2019	N/A	N/A
NC House J-25.bdr	bdr	101,376	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.bin	bin	43,740	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/10/17 10:03:20 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.bmp	bmp	87,894	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 07:07:28 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:59:16 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\7bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_071931_tsoshibalnc3051 \C:\MPRwork\NCP\Plans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J25.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:44 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.DCB	DCB	1,822	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/09/17 09:07:22 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.gpp	gpp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.gpp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.map	map	257,186	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MPRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 07:07:30 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

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LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
NC House J25.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.ppt	ppt	20,374,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.ppt	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:16 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.r0	r0	76,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25.rdp	rdp	3,487	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 07:07:30 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:22 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J25bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibalnc3051\C\MRwork\NCP\Plans\NCHouse J25 Backups\NCHouse J25003.bak.zip\ZIP Volume\NCHouse J25bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J-25ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibainc3051\C\MPRwork\NCP\ans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/20/17 09:51:34 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibainc3051\C\MPRwork\NCP\ans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibainc3051\C\MPRwork\NCP\ans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	07/23/17 05:35:16 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-25vt.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibainc3051\C\MPRwork\NCP\ans\NCHouse J-25 Backups\NCHouse J-25003.bak.zip\ZIP Volume\NCHouse J-25vt.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/25/17 04:30:42 PM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3003.bak.zip	zip	8,947,656	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_toshibainc3065\C\MPRwork\NCP\ans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	08/14/2017 08:31:39 PM	08/14/2017 08:31:39 PM	08/14/2017 08:31:39 PM	N/A	N/A	N/A	04/28/2019	06/04/2019	N/A	N/A
NC House J-3.bdr	bdr	101,376	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_toshibainc3065\C\MPRwork\NCP\ans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.bdr	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.bin	bin	42,350	C:\Seagate Dashboard 2.0\TOSHIBA-PC\ts\hiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_toshibainc3065\C\MPRwork\NCP\ans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:44:40 AM (time one not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J-3.bmp	bmp	92,214	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.bmp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 08:21:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.BX	BX	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.BX	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.cdd	cdd	1,024	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.cdd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.cdk	cdk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.cdk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.dbd	dbd	4,589	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.dbd	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.DCB	DCB	1,775	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.dsc	dsc	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibalnc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.dsc	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J-3.dsk	dsk	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.dsk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.grp	grp	2,048	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.grp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.lok	lok	40,960	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.lok	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.map	map	246,382	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.map	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 08:21:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.pnk	pnk	6,144	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.pnk	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.pts	pts	17,410,000	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.pts	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.r0	r0	76,800	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b- ea77894bb5b2\20170814_203114_toshibainc3065 \C:\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.r0	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

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NC House J-3.r1	r1	14,336	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.r1	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3.rdp	rdp	3,428	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3.rdp	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	08/14/17 08:21:00 PM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3bk.bin	bin	3,467,844	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3bk.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:42:40 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3bk.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3bk.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3ct.bin	bin	1,200	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3ct.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3ct.DCB	DCB	51	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3ct.DCB	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/17/17 10:58:46 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A
NC House J-3vt.bin	bin	32,304	C:\Seagate Dashboard 2.0\TOSHIBA-PC\tsoshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_tsoshibalnc3065\C\MPRwork\NCP\Plans\NCHouse J-3 Backups\NCHouse J-3003.bak.zip\ZIP Volume\NCHouse J-3vt.bin	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	N/A	06/18/17 06:43:22 AM (time zone not determined)	N/A	N/A	N/A	N/A	04/28/2019*	06/4/2019*	N/A	N/A

Files Reviewed and Relied Upon by the Plaintiffs' Experts

In The Common Cause Matter/Case No: 18-CVS-014001

July 1, 2019 | Eastern Time Zone (Unless Otherwise Noted)

LEGEND: * represent files extracted from zip file.

Name	File Ext	Logical Size (Bytes)	Full Path	ESN	Type	Serial Number	Comments	Created (File System)	Last Modified (File System)	Last Accessed (File System)	Created (Embedded)	Last Modified (Embedded)	Last Printed	Earliest Date Provided to Blake Esselsbyn	Earliest Date Provided to Jowel Chen	Earliest Date Provided to Christopher Cooper	Earliest Date Provided to Wesley Pegden
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NC.rdl	rdl	31,443	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170908_163144_toshibainc3247\C\MPRwork\NC.rdl	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	09/08/2017 04:32:05 PM	09/08/2017 04:32:05 PM	09/08/2017 04:32:05 PM	N/A	N/A	N/A	04/27/2019	N/A	N/A	N/A
Johns-on-Samps on-Wayne Dis t.pdf	pdf	358,119	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170601_122652_toshibainc2218\C\Users\toshiba\Documents\Tom,NC 2017 Redistricting\Johns-on-Samps on-Wayne Dis t.pdf	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	06/01/2017 12:27:15 PM	06/01/2017 12:27:15 PM	06/01/2017 12:27:15 PM	N/A	N/A	N/A	04/17/2019	05/22/2019	05/22/2019	N/A
NC Senate CCN C Sample Plan - June 2017.xls	xls	32,768	C:\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\77bc3748-d314-4cc2-a86b-ea77894bb5b2\20170708_130532_toshibainc2751\C\Users\toshiba\Documents\Tom,NC 2017 Redistricting\NC Senate CCN C Sample Plan - June 2017.xls	ES0007C	External HDD	NA7J06GX	Silver and black in color, labeled "#3"	07/08/2017 01:05:52 PM	07/08/2017 01:05:52 PM	07/08/2017 01:05:52 PM	N/A	7/8/2017 04:58:28 PM (time zone not determined)	N/A	04/17/2019	05/22/2019	05/22/2019	N/A

EXHIBIT 4

STATE OF NORTH CAROLINA GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
COUNTY OF WAKE 18 CVS 014001

COMMON CAUSE, ET AL.,)
)
Plaintiffs,)
)
vs.)
)
DAVID LEWIS, IN HIS OFFICIAL)
CAPACITY AS SENIOR CHAIRMAN)
OF THE HOUSE SELECT COMMITTEE)
ON REDISTRICTING, ET AL.,)
)
Defendants.)

VIDEOTAPED DEPOSITION OF
STEPHANIE HOFELLER

9:38 A.M.
FRIDAY, MAY 17, 2019

POYNER SPRUILL

301 FAYETTEVILLE STREET, SUITE 1900

RALEIGH, NORTH CAROLINA

BY: LISA A. WHEELER, RPR, CRR

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2

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24
25

4

1 I first saw them I knew that they were all
 2 belonging to my father and mother. I wasn't
 3 really sure which of them, if any, would have
 4 anything involving his work in North Carolina
 5 or elsewhere.
 6 Q. Got it. Let -- let's focus on the time when
 7 you received the subpoena and you --
 8 A. Oh, at that point, yes, I did know that it
 9 contained -- that all of those devices had at
 10 least -- at least one or two -- at least one
 11 or two files that would -- that were labeled
 12 in a -- in a way that it was obvious that
 13 they pertained to my father's work
 14 redistricting in North Carolina.
 15 Q. And did you send the storage devices -- those
 16 storage devices that we've been discussing to
 17 the plaintiffs' lawyers in response to the
 18 subpoena?
 19 A. Yes, I did.
 20 Q. Okay. Do you recall roughly when you sent
 21 them?
 22 A. I remember it was about a month after I
 23 received the subpoena. Originally, I -- my
 24 intention was to -- to bring them physically
 25 to Raleigh, but I got delayed and it was then

13

1 decided that it would be best for preserving
 2 the integrity of -- of the evidence that it
 3 would be going straight to a third party.
 4 Q. Great. And I'll represent to you that I
 5 received the materials you sent on March
 6 13th. Does that sound about right in terms
 7 of --
 8 A. That does.
 9 Q. -- the time?
 10 A. That does, actually. Where -- where I was in
 11 Kentucky, I couldn't even find a FedEx
 12 office. I had to go -- I had to go down the
 13 highway. I was surprised.
 14 MR. JONES: Can we mark this?
 15 (HOFELLER EXHIBIT 2 was marked for
 16 identification.)
 17 BY MR. JONES:
 18 Q. I'm showing you what's been marked as Exhibit
 19 2. On the -- you can take a moment to -- to
 20 flip through. That's fine. Go ahead.
 21 A. That's...
 22 Q. So my first question is, if you look at the
 23 very first page, do you -- do you recognize
 24 the -- the photograph -- the photographs
 25 there as images of the package that you sent

14

1 containing the storage devices in --
 2 A. Yes.
 3 Q. -- response to the subpoena?
 4 A. Yes, that does appear to be the box that I
 5 sent them in, exactly.
 6 Q. Great. And -- and on the first page, if you
 7 look at that top picture, it's addressed to
 8 R. Stanton Jones at Arnold & Porter, LLP, at
 9 an address in Washington, D.C. Is that the
 10 address where you sent the package?
 11 A. Yes.
 12 Q. Great. And if you flap -- flip to the second
 13 page, do you recognize those as additional
 14 photographs of the outside of the package
 15 that you sent with the storage devices in
 16 response to the subpoena?
 17 A. Yes.
 18 Q. If you flip to the third page, if you'll
 19 focus on the bottom image, do you recognize
 20 that as a photograph of the -- the interior
 21 of the box that you sent to the plaintiffs'
 22 lawyers with the storage devices in response
 23 to the subpoena?
 24 A. Yes.
 25 Q. Okay. If you flip to Page 4, do you

15

1 recognize the image there as being one of the
 2 thumb drives that you put in the -- in the
 3 package and sent to the plaintiffs' lawyers
 4 in response to the subpoena?
 5 A. Yes.
 6 Q. Okay. Do you remember offhand how many
 7 external hard drives there were and how many
 8 thumb drives there were?
 9 A. I know there were four external hard drives.
 10 I honestly don't remember exactly how many --
 11 you know, there were -- I -- I -- there were
 12 a couple of empty thumb drives in my -- in
 13 my, you know, possession so I -- I was making
 14 sure that I wasn't, you know, sending
 15 anything wrong. These were all the ones
 16 that -- that I got from my father, but I
 17 don't remember exactly -- from his room, but
 18 I don't remember exactly how many there were.
 19 Like eight or nine, maybe, was it, or seven?
 20 Q. So if I -- I'll represent to you that inside
 21 the package that we received that we're
 22 looking at photographs of there were -- there
 23 were four external hard drives, as you said,
 24 and also 18 thumb drives.
 25 A. 18, yeah. Okay.

16

1 Q. Does that seem right?
 2 A. Yeah.
 3 Q. Great.
 4 A. Yeah.
 5 MR. FARR: Excuse me. I don't mean to
 6 interrupt and I'm new to the game, but what
 7 were the stipulations about objections in
 8 this case? Are all objections reserved
 9 except for privilege and form of the
 10 question?
 11 MR. SPEAS: Yeah. That's the way we've
 12 been operating so far.
 13 MR. FARR: Okay. Thank you.
 14 BY MR. JONES:
 15 Q. I'm not going to go through every single
 16 photograph here. There's about 50 pages of
 17 photographs. But would you just take a
 18 moment and flip through them and if you could
 19 just tell me, do you recognize these as
 20 photographs of the storage devices, both the
 21 external hard drives and the thumb drives,
 22 that you sent to the plaintiffs' lawyers in
 23 response to the subpoena? Do you recognize
 24 them that way?
 25 A. So far, yes. It's a rainbow of colors. I

17

1 remember that, too. Yes, those look -- all
 2 of them I -- I remember.
 3 Q. Great. So having flipped through all of the
 4 photographs here, you recognize all of these
 5 images --
 6 A. Yes.
 7 Q. -- as being --
 8 A. I -- I don't see anything that I didn't have
 9 my hands on and put in that package.
 10 Q. Okay. Excellent. Would you flip to Page 23.
 11 Do you see the image there of a storage
 12 device with the label, NC Data?
 13 A. Yes, I do.
 14 Q. Do you recall that as one of the images that
 15 you sent?
 16 A. I do.
 17 Q. Or, sorry, as one of the --
 18 A. One of the --
 19 Q. -- storage devices?
 20 A. -- storage devices, yes.
 21 Q. Okay. Before sending all of these storage
 22 devices to the plaintiffs' lawyers in
 23 response to the subpoena you received, did
 24 you alter any of the -- the contents of the
 25 storage devices?

18

1 A. No.
 2 Q. Okay.
 3 A. No.
 4 Q. Did you -- did you delete any files that were
 5 on any of the storage devices?
 6 A. No. I was careful not to add or take
 7 anything away.
 8 Q. Did you modify any of the files in any way?
 9 A. No.
 10 Q. Okay. You didn't make any changes at all to
 11 any of the files --
 12 A. None.
 13 Q. -- on the storage devices? You have to --
 14 A. I'm sorry.
 15 Q. Yeah. You -- you -- I'll just start over
 16 again so we have a clean record.
 17 A. Yes.
 18 Q. So you -- you did not make any changes to any
 19 of the files or data on these storage devices
 20 before sending them to the plaintiffs'
 21 lawyers in response to the subpoena?
 22 A. That's correct. I did not.
 23 Q. Okay. You can put that to the side. So now
 24 I have some -- some pretty basic questions
 25 about where you got the devices from. Is

19

1 that okay?
 2 A. Yes.
 3 Q. Okay. Great. So, first, can you please tell
 4 me just the month and the year when you got
 5 these devices.
 6 A. October 2018.
 7 Q. Okay. And next could you please tell me just
 8 where specifically did you get the devices
 9 from, just the physical location for
 10 starters?
 11 A. The apartment where my recently deceased
 12 father lived with my mother at Springmoor.
 13 Q. Okay. And what is Springmoor?
 14 A. Springmoor is a retirement community.
 15 Q. Okay. And your father and mother had been
 16 living in this apartment in Springmoor before
 17 his -- his death; is that right?
 18 A. That's correct.
 19 Q. Okay. And at the time you got these files
 20 from the Springmoor apartment in October
 21 2018, was your mother living there at the
 22 time?
 23 A. Yes, she was.
 24 Q. Okay. Before getting the devices from the
 25 apartment in Springmoor, did you ask your

20

1 mother if it was okay to take them?
 2 A. Yes, I did.
 3 Q. Okay. And did you ask her that in October
 4 2018?
 5 A. Yes, that -- that same day.
 6 Q. Okay. Did your mother object to you taking
 7 the devices?
 8 A. No, she didn't.
 9 Q. Okay. Did -- did -- did she say it was okay
 10 to take the devices?
 11 A. Yes. She encouraged me to.
 12 Q. Okay. So now I'm -- I'm going to back and --
 13 and ask a few more questions just to fill in
 14 some additional details about when and where
 15 you got the devices, okay?
 16 A. Yes.
 17 Q. Okay. When did you first learn that your
 18 father had died?
 19 A. September 30th, 2018.
 20 Q. Okay. And when you -- when you learned of
 21 his death -- and -- and I'll say for the
 22 record, I'm -- I'm sorry for your -- for the
 23 loss.
 24 When you learned of your father's death,
 25 did you contact your mother?

21

1 A. Yes.
 2 Q. Did -- did you go to visit her then?
 3 A. Yes.
 4 Q. Okay. And -- and did you go to visit her in
 5 Raleigh at the Springmoor apartment in
 6 October 2018?
 7 A. Yes, I did.
 8 Q. And at that time when you were there at the
 9 Springmoor apartment in Raleigh in October
 10 2018 visiting your mother, did -- did you
 11 go -- did you and your mother go through some
 12 of your father's things?
 13 A. There wasn't much to go through. Most of
 14 what there even was in there was what was
 15 left out, really. There were a couple of
 16 desk drawers. I -- there were a couple of
 17 keepsakes of mine that I was looking for, but
 18 one of the main reasons that I was looking
 19 was because when I walked in the door to his
 20 room, immediately I saw a keepsake of mine
 21 from my childhood, a -- a jewelry box that I
 22 had and that I had left in -- in my parents'
 23 care. And inside of it -- it was displayed
 24 prominently right under the flag that he was
 25 buried with and -- well, not with but the

22

1 flag that draped his coffin and a picture of
 2 my grandparents and inside the box was
 3 everything exactly as I had left it. So I
 4 took that to mean that I was supposed to look
 5 for other things and so I started -- I -- I
 6 thought there was a chance that there might
 7 have been something specifically for me as in
 8 a note or a message of some sort that I would
 9 find.
 10 Q. Okay. And -- and was that when you found the
 11 storage devices that we've been discussing?
 12 A. It was in that same incident, yes, that --
 13 that same evening.
 14 Q. Okay. And where in the apartment were the
 15 storage devices?
 16 A. They were on a shelf in my father's room.
 17 Q. Okay. Were they just sitting out open on the
 18 shelf?
 19 A. Yes, they were. There was a bag -- a clear
 20 plastic bag with the thumb drives and
 21 ad-sticks and then there was just a stack
 22 of -- it wasn't the only thing on the shelf.
 23 He had also some of those pullout boxes that
 24 kind of are like drawers that had some of his
 25 papers in there, and the -- the hard drives

23

1 just were there in the corner of -- it was
 2 a -- one of those kind of box-style book
 3 shelves. It wasn't just a straight shelf.
 4 Some of them had those removable drawers in
 5 them and others were just open.
 6 Q. Okay. But all of the four external hard
 7 drives and the 18 thumb drives that you sent
 8 to the plaintiffs' lawyers in response to the
 9 subpoena were on this bookshelf in your
 10 father's room in the apartment at Springmoor?
 11 A. That's right.
 12 Q. Okay. And -- and they weren't in any sort of
 13 safe or lockbox; they were -- they were just
 14 out?
 15 A. That's right.
 16 Q. Okay. Had you seen any of these storage
 17 devices before?
 18 A. Inasmuch as I could say later having looked
 19 at them and when they were done, then I was
 20 able to confirm that, yes, there were a
 21 couple of those that I recognized from when I
 22 was either staying with on short trips or
 23 living with my parents in their house in
 24 Alexandria, Virginia.
 25 Q. Okay. And -- and could you just tell me

24

1 briefly how -- how did you recognize -- what
 2 was the connection that you made to these
 3 storage devices?
 4 A. The -- one of them had that blue rubber
 5 lining around it that I recognized
 6 immediately, and I know that there could be
 7 more than one and I also know it's a
 8 removable cover, so -- but then it just -- it
 9 appeared to be really what I -- what I was
 10 looking for, really.
 11 Q. And after getting the storage devices, when
 12 did you ask your mother if it was okay to
 13 take them?
 14 A. When I noticed them, it was in a survey and
 15 I'd first come in and -- and I was a little
 16 overwhelmed with emotion when I first walked
 17 into my father's room. Excuse me. So, you
 18 know, I was sort of looking around. There
 19 was heirloom furniture all around the
 20 apartment and other -- other things that
 21 belonged to my extended family, my, you know,
 22 great-grandparents and such, so I -- I sort
 23 of took the whole thing in, had another sort
 24 of, you know, casual, brief conversation with
 25 my mother about how things had unfolded, and

25

1 it was later when I was back in there and I
 2 also said, this is -- I think he wanted me to
 3 have this jewelry box. And so I said, I'm
 4 going to take that. Is that okay? And she
 5 said, of course. And I said, I'm going to
 6 take these, too. I think that I'll find the
 7 pictures and some of the things that I'm
 8 looking for on -- on these. Can I take
 9 these? And she said, absolutely. She -- she
 10 said, I don't even know how to use them.
 11 Q. Okay. Do you know if anyone else other than
 12 you had been to your parents' apartment at
 13 Springmoor to -- to look through or -- or
 14 potentially take any of your father's things
 15 before you had gotten there?
 16 A. That was my understanding because before I
 17 took any of those things, I specifically
 18 asked my mother -- I said, he had a work
 19 laptop still, yes? She said, yes. And she
 20 said, and a work computer. And I said, okay,
 21 did Dale come and take that stuff? She said,
 22 yes, Dale took the laptop, Dale took the work
 23 computer, and Dale took everything that he
 24 wanted.
 25 Q. And -- and who is Dale?

26

1 A. Dalton Lamar Oldham. That was my father's
 2 business partner, attorney. Together he and
 3 my father were Geographic Strategies.
 4 Q. Okay. And -- and you understood your mother
 5 to be telling you that Mr. Oldham had come to
 6 the apartment in Springmoor after your
 7 father's death and taken -- is -- was it a
 8 laptop and a desktop computer?
 9 A. Yes. And, again, it was a -- it wasn't clear
 10 exactly how much had -- he had taken as my
 11 father was dying that he had -- that my
 12 father had said to him, take this. I don't
 13 think my mother really remembers exactly what
 14 was there before and -- shortly before and
 15 then shortly after his -- his death.
 16 Q. Okay. Great. Thank you. Okay. So now I
 17 have some questions just about what you did
 18 after getting the devices, okay?
 19 A. Uh-huh.
 20 Q. Great. So after getting the devices from
 21 your parents' apartment in Springmoor, did
 22 you consistently hold on to them until you
 23 sent them to the plaintiffs' lawyers in
 24 response to the subpoena?
 25 A. Yes.

27

1 Q. Okay. You didn't give them to anyone else
 2 for any period of time in there?
 3 A. No.
 4 Q. Okay.
 5 A. I'm sorry I laugh. It's just I was so
 6 thrilled to have some of this precious data
 7 of mine that I would not let anyone else near
 8 them.
 9 Q. Great. And did -- did you stay in Raleigh
 10 then or did -- did you eventually go back to
 11 Kentucky?
 12 A. I stayed in Raleigh for a few days that time
 13 and then I went back to Kentucky.
 14 Q. Okay. And -- and did you take the storage
 15 devices with you when you went back to
 16 Kentucky?
 17 A. Yes, I did.
 18 Q. Okay. And were you then able to look at any
 19 of the -- the actual contents of the devices?
 20 A. I looked at the content of some of them that
 21 first night in my hotel room in Raleigh.
 22 Q. Oh, okay. And did -- am I -- did you -- you
 23 connected them to a computer to be able to
 24 look at them?
 25 A. Yes. Yes. I had a -- I had -- I had a

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1 laptop with me that I use. I had found a --
 2 an appropriate cable in one -- one of my
 3 father's drawers I found a whole box of
 4 cables and one of them was the proper adapter
 5 for that -- for those external hard drives.
 6 Q. Okay. And -- and when you -- when you did
 7 connect some of the -- the storage devices to
 8 the computer to be able to look at the
 9 contents, did -- did you see any personal
 10 information in there like photographs or
 11 other personal information?
 12 A. Yes. I found specifically really what I was
 13 looking for, which were files of mine that I
 14 had -- essentially I backed them up onto my
 15 parents' computer when I was visiting them
 16 last and, actually, many times before that as
 17 I felt that it was a really good way to
 18 assure that they would be preserved because I
 19 knew that my father was not -- you know, I
 20 knew he had a tendency to -- to be, you know,
 21 careful about those things -- those kinds of
 22 things. And, yes, I found a great many
 23 photographs that I was looking for of my
 24 children and other documents that were
 25 related to my life, matters that concerned me

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1 and my children, and it was -- it was -- I
 2 felt, well, I buried this treasure and that I
 3 was getting to dig it up. I was really very
 4 excited to see those pictures again,
 5 pictures -- also some pictures of my -- of my
 6 great-grandparents and things like that that
 7 I had hoped that I would find copies of as
 8 well.
 9 Q. Got it. So -- so some of these photographs
 10 and other personal materials were things that
 11 you yourself had stored on your parents'
 12 computer years earlier when your father was
 13 still alive; is that correct?
 14 A. That's correct.
 15 Q. Okay. And -- and you -- you saw some of
 16 those materials on these storage devices?
 17 A. Yes.
 18 Q. Okay. Other than personal files like
 19 photographs, letters, et cetera, did you see
 20 data or files on the storage devices re- --
 21 that related to your father's work creating
 22 maps?
 23 A. Yes, I did.
 24 Q. Okay. And I think I asked this before, but
 25 I'll just ask it again. Before sending the

30

1 storage devices to the plaintiffs' lawyers in
 2 this case in response to the subpoena, did
 3 you change or manipulate any of the files on
 4 the storage devices that related to your
 5 father's work?
 6 A. No, I did not.
 7 Q. Okay. Am I right that at some point after
 8 getting the storage devices, you contacted
 9 someone at the organization Common Cause; is
 10 that right?
 11 A. Yes.
 12 Q. Okay. And do -- do you remember the specific
 13 person who you first contacted at Common
 14 Cause?
 15 A. I first reached out to Bob Phillips, the
 16 director, and it was in hopes that he might
 17 be able -- he and Common Cause might be able
 18 to give me a referral to find an attorney for
 19 my mother.
 20 Q. Okay. And in the course of those discussions
 21 with Mr. Phillips, did you -- did you discuss
 22 these storage devices?
 23 A. Not in that conversation, no.
 24 Q. Okay. Did Mr. Phillips connect you to
 25 someone else at Common Cause?

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1 A. Yes.
 2 Q. Okay. And who was that?
 3 A. Jane Pinsky.
 4 Q. Did you then have discussions with
 5 Ms. Pinsky?
 6 A. Yes, I did.
 7 Q. Okay. And in the course of those discussions
 8 with Ms. Pinsky did you mention the storage
 9 devices that we've been discussing?
 10 A. Yes, I did.
 11 Q. Okay. And did -- did you offer to -- to
 12 provide the devices to Ms. Pinsky and Common
 13 Cause?
 14 A. You know, when I first brought it up it was
 15 really just kind of an anecdotal reference to
 16 a interview with David Daley that I had
 17 recently read. At the end of this interview
 18 his last statement, and it was really the --
 19 the gist of it was about the fact that the
 20 rejected districts had been sent for redraw
 21 back to my father and now he was deceased and
 22 the comment that David Daley made was, I
 23 wonder -- I -- I think that somewhere out
 24 there on a hard drive there's a gift for the
 25 state legislators.

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1 father, documents that I might have otherwise
 2 possession of if it weren't for first a house
 3 fire that destroyed everything I owned in
 4 2013 and also a divorce in which everything
 5 else that I had pretty much was, you know,
 6 left in the hands of -- of someone I didn't
 7 really feel like communicating with.
 8 Q. You didn't consider the records relating to
 9 your father's work -- redistricting work to
 10 be your data, correct?
 11 A. The hard drives were given to me by my -- by
 12 my mother, so I would say that I considered
 13 everything on those hard drives that my
 14 father had left in his room that my mother
 15 gave to me unconditionally -- I considered
 16 all of it mine at that point when it was
 17 given to me by my deceased father's wife.
 18 Q. Even if the material related to your father's
 19 business with another business partner, you
 20 considered it your material, your --
 21 A. I considered the stor- --
 22 MR. JONES: Ob- -- objection. It's
 23 been asked and answered.
 24 MR. SPARKS: Go ahead and answer.
 25 A. I considered everything that my mother gave

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1 me that had previously belonged to my father
 2 who was now dead mine, yes.
 3 Q. Did your father have a will?
 4 A. Yes.
 5 Q. Do you know if in the will there was any
 6 provision with respect to his personal
 7 property and who the personal property would
 8 be left to?
 9 A. My understanding, not being an estate
 10 attorney, is my mother was the beneficiary.
 11 Q. Have you seen a copy of the will?
 12 A. Yes.
 13 Q. Did you -- did your father make any direct
 14 gifts to you in the will?
 15 A. I don't believe he did, no.
 16 Q. Did your father in the will address anything
 17 related to his -- his business records,
 18 business files?
 19 A. I don't recall.
 20 Q. Prior to turning over the electronic files to
 21 Arnold & Porter you said you spent two to
 22 three hours immediately before turning them
 23 over to Arnold & Porter. I would like to
 24 understand how much time in total you spent
 25 reviewing the materials at any point in time

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1 before you gave them to Arnold & Porter.
 2 A. That would be difficult. Do you mean -- you
 3 know, I -- for example, I printed out copies
 4 of pictures of me and my children. Do you
 5 consider me putting those on my wall time
 6 reviewing the materials?
 7 Q. No. Time spent looking through the
 8 electronic files on a computer.
 9 A. That would be very difficult to determine. I
 10 mean, I don't know. How much time do you
 11 spend looking at pictures of your children?
 12 Q. Putting aside the amount -- well --
 13 A. I didn't spend a lot of time looking at my
 14 father's work files if that's what you're
 15 driving at. No, I didn't.
 16 Q. So let's focus on that point. Putting aside
 17 the time you spent looking through files that
 18 related to you or photographs related to you
 19 or issues that were personal to you, putting
 20 all of those personal materials aside, how
 21 much time would you estimate you spent
 22 reviewing files that related to your father,
 23 his redistricting work, his business records,
 24 any expert documents he may have created,
 25 those materials?

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1 A. Well, it's also hard because there were
 2 certain situations in some of those backups
 3 where there were folders that contained a
 4 multitude of mixed documents. In certain
 5 cases I would open something thinking that it
 6 was one thing and find that it was something
 7 different. So there were -- there were both
 8 situations where -- for example, news
 9 articles that he had in a folder of -- I
 10 believe there were a lot of -- of news
 11 articles that I actually read through that he
 12 had saved, maybe articles even that mentioned
 13 him specifically and, of course, I was
 14 interested in preserving that. Of course, I
 15 wanted, you know, a scrapbook of my father
 16 and so -- also, there were -- just looking at
 17 the file extensions and having a basic
 18 familiarity with my father's work, I knew a
 19 lot of them would be file extensions that I
 20 wouldn't even be able to open considering
 21 that I didn't have the right proprietary
 22 software. So -- wow. I really -- it would
 23 be very difficult for me to give an estimate.
 24 I don't really understand. Maybe -- I mean,
 25 not -- not to be snide, but what -- what --

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1 what -- what exactly are we driving at? How
 2 many hours I spent looking specifically at
 3 just the files in folders that contained
 4 things like, again, letters to me, old trust
 5 documents, letters that my grandfather sent
 6 to my father, and interesting stories and
 7 maybe a few photographs, some of them of my
 8 father and my relatives, some of them my
 9 father and my children, some of them me and
 10 my children? It would be -- it would be very
 11 difficult to give you an estimate of how many
 12 of those minutes were spent looking at files
 13 that were specifically related to his work,
 14 much less specifically related to which -- I
 15 mean, I wouldn't be able to distinguish the
 16 legislative maps from the congressional
 17 district maps.

18 Q. Is it fair to say that the majority of the
 19 time you spent reviewing the files was spent
 20 reviewing materials related personal to you
 21 and that, in comparison, you spent very
 22 little time reviewing files related --

23 A. Very little --

24 Q. -- to your father's --

25 A. -- is kind of a --

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1 MR. SPARKS: Hold, please.

2 BY MS. SCULLY:

3 Q. -- work? Yeah. It's a --

4 A. I'm sorry.

5 Q. It's -- my question, is it fair to say that?

6 MR. JONES: Objection, asked and
 7 answered.

8 MR. SPARKS: Please answer.

9 A. Yes.

10 MR. JONES: We've been going about
 11 an -- about an hour.

12 MS. SCULLY: We can take a break.

13 MR. JONES: Can we take a break?

14 THE WITNESS: This time I am going to
 15 smoke a cigarette.

16 THE VIDEOGRAPHER: Going off the
 17 record. The time is 11:39 a.m.

18 (Whereupon, there was a recess in the
 19 proceedings from 11:39 a.m. to 11:59 a.m.)

20 THE VIDEOGRAPHER: Going back on the
 21 record. The time is 11:59 a.m.

22 BY MR. SPARKS:

23 Q. Ms. Hofeller, you testified earlier today
 24 that Dale got all the good stuff. What did
 25 you mean by that?

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1 A. The specifically work-related stuff, the
 2 stuff that would be -- you know, the stuff
 3 that he wanted, the stuff that he felt was
 4 pertinent.

5 Q. And you said he took two computers from your
 6 father's office; is that correct?

7 A. That's what I'm told.

8 Q. You've also testified today that these hard
 9 drives and the thumb drives, you understood
 10 them to be backups, correct?

11 A. That's correct.

12 Q. Was it your understanding that your father's
 13 work-related files that they had on the
 14 computer that Dale Oldham had taken or
 15 computers that he'd taken were also backed up
 16 on any of these hard drives or thumb drives
 17 that you received?

18 MR. JONES: Ob- -- objection, calls for
 19 speculation.

20 A. Honestly, if I speculated I would speculate
 21 that any backups that had been done
 22 specifically of the work computers would be
 23 already taken by him. I did not -- I did
 24 not -- actually, the opposite. I assumed
 25 that these were personal backups because they

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1 were there with -- with those things. And,
 2 again, it's -- it's always been a little
 3 bit -- those lines have always been a bit
 4 blurry in the household.

5 MR. BRANCH: All right. I'm --

6 BY MS. SCULLY:

7 Q. Do you --

8 MR. BRANCH: -- going to remind
 9 everybody here that under the North Carolina
 10 rules, counsel's only supposed to object to
 11 the form of the question. There are no
 12 speaking objections allowed in North
 13 Carolina. This is multiple times now that
 14 the witness has changed her answer in
 15 response to a speaking objection by
 16 Mr. Jones. Now, unless I'm mistaken,
 17 Mr. Jones, you do not represent the witness.
 18 Under the rules you can object to the form of
 19 the question and that's it. You can't
 20 instruct her not to answer and she should not
 21 be changing her testimony in response to
 22 something that you articulate for her.

23 BY MS. SCULLY:

24 Q. Ms. Hofeller, do you, in fact, know one way
 25 or another if the information that was

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EXHIBIT 5

From: Strach, Phillip J. <phil.strach@ogletree.com>
Sent: Thursday, May 2, 2019 2:45 PM
To: Jones, Stanton; Jacobson, Daniel; McKnight, Michael D.; Raile, Richard; Braden, E. Mark; Stanley, Trevor M.; Riggins, Alyssa; Brennan, Stephanie; Majmundar, Amar; Cox, Paul; joshua.lawson@ncsbe.gov; John Branch; NPencook@shanahanmcdougal.com; Christine McCaffrey
Cc: Eddie Speas; Mackie, Caroline P.; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com; zzz.External.AKhanna@perkinscoie.com; Gersch, David P.; Theodore, Elisabeth
Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Stanton:

Please ship the forensic images to Setec Investigations at the address below. We would appreciate the courtesy of sending us a tracking number so that we may provide our team with notice of arrival. Additionally, please confirm that you will comply with standard e-discovery protocol and do the following:

1. Include with the drive shipment chain of custody forms, including chain of custody forms for each of the media drives received from Ms. Hofeller/Lizon;
2. Provide us with descriptions, names and photos of all original media drives;
3. Provide us with the excel version of the PDF "index" previously produced to us with columns indicating the file size, and file extension. We also request that you clarify whether the document path shown on the current PDF index reflect the original document path, or the original document path combined with the document path in the vendor's system.

Setec Investigations

Attention: Todd Stefan
145 S Fairfax Ave., Suite 200
Los Angeles, CA 90036
323-939-5598

Thanks.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
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From: Strach, Phillip J.
Sent: Thursday, May 02, 2019 1:37 PM
To: 'Jones, Stanton' <Stanton.Jones@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch

<JBranch@shanahanlawgroup.com>; NPencook@shanahanmcdougal.com; Christine McCaffrey
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Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>;
melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Gersch, David P.
<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Stanton: we would like you to ship the materials for Legislative Defendants directly to our vendor. I will provide the shipping information as soon as possible this afternoon. Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: Jones, Stanton <Stanton.Jones@arnoldporter.com>

Sent: Wednesday, May 01, 2019 6:35 PM

To: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Strach, Phillip J. <Phil.Strach@ogletreedekins.com>;
McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E.
Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa
<Alyssa.Riggins@ogletreedekins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar
<amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch
<JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com)
<DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>;
melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Gersch, David P.
<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Also per Stroz Friedberg, and in furtherance of our compliance with the Court's order, it takes a long time to copy 2 terabytes of data, three times over (one copy per defendant group). So if any defendant group wants copies made and sent to you this week, Stroz needs to start the copying at 9am sharp tomorrow (Thursday). Alternatively, as I noted below, arrangements can be made for you or someone on your behalf to visit Stroz's office in DC to inspect and copy the materials onsite this week. Please let us know promptly how you wish to proceed.

Regards,
Stanton

From: Jones, Stanton

Sent: Wednesday, May 1, 2019 5:39 PM

To: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>; McKnight,
Michael D. <Michael.McKnight@ogletreedekins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark
<MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa
<Alyssa.Riggins@ogletreedekins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar
<amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch
<JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com)
<DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>;
melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>;
zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Gersch, David P.

<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Per Stroz Friedberg, the cost to copy and send the materials is \$2,500 per copy + shipping cost (minimal FedEx fees). Hence, if all three sets of defendants each want a copy made and sent to them, the total cost would be \$7,500, split three ways, plus the FedEx fees. Please let us know how you want to proceed.

Regards,
Stanton

From: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Sent: Wednesday, May 1, 2019 5:34 PM

To: Strach, Phillip J. <phil.strach@ogletree.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Gersch, David P.

<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Phil, we've been told that the total volume of data is roughly 2 Terabytes.

Best,
Dan

Daniel Jacobson
Senior Associate

Arnold & Porter
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Washington | District of Columbia 20001-3743
T: +1 202.942.5602
Daniel.Jacobson@arnoldporter.com | www.arnoldporter.com

From: Strach, Phillip J. <phil.strach@ogletree.com>

Sent: Wednesday, May 1, 2019 5:32 PM

To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Gersch, David P.

<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Stanton: in assessing this issue, it would also be helpful for us to know the total volume of the data/files. Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: Jones, Stanton <Stanton.Jones@arnoldporter.com>

Sent: Wednesday, May 01, 2019 5:06 PM

To: McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>;

melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Gersch, David P.

<David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Counsel:

In light of the Court's order below on the motion for clarification, please let us know immediately how each set of defendants prefers for the Stephanie Hofeller subpoena response materials to be made available to you for inspection and copying -- namely, whether you will send someone to Stroz's office in DC to inspect and copy the materials yourself, or whether you instead want us to have a copy of the materials made and sent to you, at your expense (which we are inquiring about now). We are standing by awaiting direction from each set of defendants.

Regards,
Stanton

R. Stanton Jones

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From: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>

Sent: Wednesday, May 1, 2019 4:57 PM

To: McKnight, Michael D. <michael.mcknight@ogletree.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar

<amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Take two...

Please find attached the complete order of the three-judge panel in this action. I apologize for the missing page and blame our scanner for keeping page 9 on the first run through.



Kellie Z. Myers
Trial Court Administrator
10th Judicial District – Wake County
PO Box 1916, Raleigh, NC 27602
O 919-792-4775

Justice for all
www.NCcourts.gov/WakeTCA



From: McKnight, Michael D. <michael.mcknight@ogletree.com>

Sent: Wednesday, May 01, 2019 4:46 PM

To: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; david.gersch@arnoldporter.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <stanley@bakerlaw.com>; melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Ms. Myers,

It appears that a page following page 8 of the attached order may be missing as there is no signature page from the judges as there usually is. It also appears that one or more numbered paragraphs containing the court's orders may be missing. Could you confirm whether this is the case and send the missing page?

Thanks,

Michael

Michael D. McKnight | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3159 | Fax: 919-783-9412
michael.mcknight@ogletree.com | www.ogletree.com | [Bio](#)

From: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>

Sent: Wednesday, May 01, 2019 4:16 PM

To: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; david.gersch@arnoldporter.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Subject: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Good afternoon,

Please find attached, for service, the order of the three-judge panel following the April 30, 2019 hearing in this matter, in Wake County Civil Superior Court. The original order will be forwarded to the Clerk of Court for the court file.

Best,



Kellie Z. Myers
Trial Court Administrator
10th Judicial District – Wake County
PO Box 1916, Raleigh, NC 27602
O 919-792-4775

Justice for all
www.NCcourts.gov/WakeTCA



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immediately by telephone or by return e-mail and delete it from his or her computer.

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EXHIBIT 6

From: Jacobson, Daniel
Sent: Thursday, May 2, 2019 6:48 PM
To: 'John Branch'; Strach, Phillip J.; Jones, Stanton; McKnight, Michael D.; Raile, Richard; Braden, E. Mark; Stanley, Trevor M.; Riggins, Alyssa; Brennan, Stephanie; Majmundar, Amar; Cox, Paul; joshua.lawson@ncsbe.gov; Nate Pencook; Christine McCaffrey
Cc: Eddie Speas; Mackie, Caroline P.; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com; zzz.External.AKhanna@perkinscoie.com; Gersch, David P.; Theodore, Elisabeth
Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Phil, John, and Paul: Stroz Friedberg estimates that the copying process should be complete by around 4pm tomorrow. Assuming that's the case, they can FedEx the materials then – please let us know if they should mark the packages for Saturday delivery or Monday delivery. In the alternative, you could arrange to have somebody go to Stroz's office tomorrow afternoon and pick up your copy there.

Phil: in response to your specific questions:

1. Stroz does not turn over their chain of custody forms, which are proprietary. However, they will attest in what they provide you that they received the unopened FedEx package containing the media from Arnold & Porter on March 13, 2019, as we have previously indicated.
2. Stroz can include descriptions, names and photos of all original media drives, as you requested.
3. We will provide an excel version with the information you requested tomorrow. Please note that this partial index is Plaintiffs' work product that Plaintiffs are under no obligation to provide, and that we provided to you previously as a courtesy to facilitate our discussion of how to approach the personal sensitive information on the media. We will nonetheless provide you the excel version as a courtesy, but we do not intend to provide any further work product. On your clarification question, the document path shown on the current PDF index may contain Stroz's unique organization and ES number, but everything following the ES number and backslash is original file path.

John, Stroz can provide the information you requested, but we assume you are requesting that information for the deliverable drives, not the original media. Please let us know if it is otherwise.

We will also provide tracking numbers for each of the shipments.

Best,
Dan

Daniel Jacobson
Senior Associate

Arnold & Porter
601 Massachusetts Ave., NW
Washington | District of Columbia 20001-3743
T: +1 202.942.5602
Daniel.Jacobson@arnoldporter.com | www.arnoldporter.com

From: John Branch <JBranch@shanahanlawgroup.com>
Sent: Thursday, May 2, 2019 3:00 PM
To: Strach, Phillip J. <phil.strach@ogletree.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Jacobson, Daniel

<Daniel.Jacobson@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; Nate Pencook <NPencook@shanahanlawgroup.com>; Christine McCaffrey <CMcCaffrey@shanahanlawgroup.com>
Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Stanton,

Please ship the drive to the following address. I will also need the FedEx or UPS tracking number.

Attn: Michael Turner
Virtacore Systems
21551 Beaumeade Circle
Ashburn, VA 20147

In addition, our vendor has informed me that it needs the following information regarding the drive **prior** to shipping:

Hard Drive Description:

Serial Number:

Passcode (if password protected):

Client Matter:

Data Size:

Thank you,

John Branch

John E. Branch III | Partner



128 E. Hargett Street | Third Floor
Raleigh, NC 27601

Phone: (919) 856-9494

Email: jbranch@shanahanlawgroup.com

Please see the IRS Circular 230 Notice and the Confidentiality Notice below before reading this email.

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From: Strach, Phillip J. <phil.strach@ogletree.com>

Sent: Thursday, May 2, 2019 1:38 PM

To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Christine McCaffrey <CMcCaffrey@shanahanlawgroup.com>

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Stanton: we would like you to ship the materials for Legislative Defendants directly to our vendor. I will provide the shipping information as soon as possible this afternoon. Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>

Sent: Wednesday, May 01, 2019 6:35 PM

To: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

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Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Also per Stroz Friedberg, and in furtherance of our compliance with the Court's order, it takes a long time to copy 2 terabytes of data, three times over (one copy per defendant group). So if any defendant group wants copies made and sent to you this week, Stroz needs to start the copying at 9am sharp tomorrow (Thursday). Alternatively, as I noted below, arrangements can be made for you or someone on your behalf to visit Stroz's office in DC to inspect and copy the materials onsite this week. Please let us know promptly how you wish to proceed.

Regards,

Stanton

From: Jones, Stanton

Sent: Wednesday, May 1, 2019 5:39 PM

To: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; melias@perkinscoie.com; zzz.External.ABranch@perkinscoie.com <ABranch@perkinscoie.com>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Per Stroz Friedberg, the cost to copy and send the materials is \$2,500 per copy + shipping cost (minimal FedEx fees). Hence, if all three sets of defendants each want a copy made and sent to them, the total cost would be \$7,500, split three ways, plus the FedEx fees. Please let us know how you want to proceed.

Regards,
Stanton

From: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Sent: Wednesday, May 1, 2019 5:34 PM

To: Strach, Phillip J. <phil.strach@ogletree.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

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Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Phil, we've been told that the total volume of data is roughly 2 Terabytes.

Best,
Dan

Daniel Jacobson
Senior Associate

Arnold & Porter
601 Massachusetts Ave., NW
Washington | District of Columbia 20001-3743
T: +1 202.942.5602
Daniel.Jacobson@arnoldporter.com | www.arnoldporter.com

From: Strach, Phillip J. <phil.strach@ogletree.com>
Sent: Wednesday, May 1, 2019 5:32 PM
To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (<DWorrell@shanahanmcdougal.com> <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com
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Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Stanton: in assessing this issue, it would also be helpful for us to know the total volume of the data/files. Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>
Sent: Wednesday, May 01, 2019 5:06 PM
To: McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Raile, Richard <rraile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (<DWorrell@shanahanmcdougal.com> <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com
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Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Counsel:

In light of the Court's order below on the motion for clarification, please let us know immediately how each set of defendants prefers for the Stephanie Hofeller subpoena response materials to be made available to you for inspection and copying -- namely, whether you will send someone to Stroz's office in DC to inspect and copy the materials yourself, or whether you instead want us to have a copy of the materials made and sent to you, at your expense (which we are inquiring about now). We are standing by awaiting direction from each set of defendants.

Regards,
Stanton

R. Stanton Jones

Arnold & Porter
601 Massachusetts Ave., NW
Washington | District of Columbia 20001-3743
T: +1 202.942.5563
Stanton.Jones@arnoldporter.com | www.arnoldporter.com

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Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

External E-mail

Take two...

Please find attached the complete order of the three-judge panel in this action. I apologize for the missing page and blame our scanner for keeping page 9 on the first run through.



Kellie Z. Myers
Trial Court Administrator
10th Judicial District – Wake County
PO Box 1916, Raleigh, NC 27602
O 919-792-4775

Justice for all
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Sent: Wednesday, May 01, 2019 4:46 PM

To: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; david.gersch@arnoldporter.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell <DWorrell@shanahanmcdougal.com> <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Subject: RE: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Ms. Myers,

It appears that a page following page 8 of the attached order may be missing as there is no signature page from the judges as there usually is. It also appears that one or more numbered paragraphs containing the court's orders may be missing. Could you confirm whether this is the case and send the missing page?

Thanks,

Michael

Michael D. McKnight | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3159 | Fax: 919-783-9412
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From: Myers, Kellie Z. <Kellie.Z.Myers@nccourts.org>

Sent: Wednesday, May 01, 2019 4:16 PM

To: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; david.gersch@arnoldporter.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Raile, Richard <rRaile@bakerlaw.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; melias@perkinscoie.com; ABranch@perkinscoie.com; AKhanna@perkinscoie.com; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; Majmundar, Amar <amajmundar@ncdoj.gov>; Cox, Paul <pcox@ncdoj.gov>; joshua.lawson@ncsbe.gov; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell (DWorrell@shanahanmcdougal.com) <DWorrell@shanahanmcdougal.com>; NPencook@shanahanmcdougal.com

Subject: Order: Common Cause, et al. v. Lewis, et al. (Wake County 18 CVS 14001)

Good afternoon,

Please find attached, for service, the order of the three-judge panel following the April 30, 2019 hearing in this matter, in Wake County Civil Superior Court. The original order will be forwarded to the Clerk of Court for the court file.

Best,



Kellie Z. Myers
Trial Court Administrator
10th Judicial District – Wake County
PO Box 1916, Raleigh, NC 27602
O 919-792-4775

Justice for all
www.NCcourts.gov/WakeTCA



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EXHIBIT 7

VIA FEDEX

May 3, 2019

ATTN: Todd Stefan

Setec Investigations
145 S Fairfax Ave., Suite 200
Los Angeles, CA 90036

RE: NC Gerrymandering Litigation

Dear Mr. Stefan,

Enclosed please find three (3) internal SATA hard drives containing forensic images of the twenty-two (22) pieces of media that Stroz Friedberg received from Arnold & Porter Kaye Scholer LLP on March 13, 2019. The media was received in a sealed FedEx box with no sign of tampering.

The hard drives provided are protected with full-disk VeraCrypt encryption, using a custom password which will be provided to you by counsel at Arnold & Porter. When connecting the drives to a Windows machine, a dialog box may appear asking if you would like to format the drive. Please do not format the drive, instead close the dialog box and proceed with the attached VeraCrypt instructions.

For your convenience, attached please find a summary spreadsheet of the data and photographs of the original pieces of media and their original packaging.

Best,

Carly Battaile
Consultant, Digital Forensics & Incident Response

Enclosure: (3) internal SATA hard drives

EXHIBIT 8

T. Hofeller Media Received from Arnold & Porter Kaye Scholer LLP
Arnold & Porter Kaye Scholer LLP: NC Gerrymandering Litigation
May 3, 2019

PRIVILEGED AND CONFIDENTIAL

#	ESN	Associated Hard Drive	Name of Original Media	Description of Original Media	Date Received
1	ES0001A	INV# 31058	Generic	T. Hofeller thumbdrive, black and silver in color, labeled "The Education Trust" and "A"	3/13/2019
2	ES0002A	INV #34394	Western Digital	T. Hofeller external drive, labeled "System Back up July 16, 2012 Toshiba Laptop Nov 2, 2012 April 16, 2013" and "#4"	3/13/2019
3	ES0003A	INV# 31058	Generic	T. Hofeller thumbdrive, black & Silver in color, labeled "Beirne, Maynard & Parsons, L.L.P.", "A" and "H"	3/13/2019
4	ES0004B	INV #34394	Seagate	T. Hofeller external drive, in blue silicone case, labeled "#1"	3/13/2019
5	ES0005A	INV# 31058	Generic	T. Hofeller thumbdrive, white and blue in color, labeled "2016 Congressional District Discovery Items" and "I"	3/13/2019
6	ES0006A	INV# 31058	SanDisk	T. Hofeller thumbdrive, labeled "D"	3/13/2019
7	ES0007C	INV #67140	Seagate	T. Hofeller external drive, silver and black in color, labeled "#3"	3/13/2019
8	ES0008A	INV# 31058	SanDisk	T. Hofeller thumbdrive, labeled "NC Data" and "F"	3/13/2019
9	ES0009A	INV# 31058	SanDisk	T. Hofeller thumbdrive, red & black in color, labeled, "NC-2" and "C"	3/13/2019
10	ES0010A	INV# 31058	Lexar	T. Hofeller thumbdrive, white & purple in color, labeled "J"	3/13/2019
11	ES0011A	INV# 31058	SanDisk	T. Hofeller thumbdrive, white, red, blue in color, labeled "O"	3/13/2019
12	ES0012A	INV# 31058	SanDisk	T. Hofeller thumbdrive, black & white in color, labeled "R"	3/13/2019
13	ES0013B	INV# 31058	Mini	T. Hofeller thumbdrive, silver in color, labeled "Census Adjustment" and "G"	3/13/2019
14	ES0014A	INV #34394	Seagate	T. Hofeller external drive, in blue silicone case, labeled "#2"	3/13/2019
15	ES0015B	INV# 31058	Generic	T. Hofeller thumbdrive, labeled "L"	3/13/2019
16	ES0016A	INV# 31058	Lexar	T. Hofeller thumbdrive, white & green in color, labeled "N"	3/13/2019
17	ES0017A	INV# 31058	SanDisk	T. Hofeller thumbdrive, red and black in color, labeled "Empty" and "M"	3/13/2019
18	ES0018A	INV# 31058	Generic	T. Hofeller thumbdrive, black and silver in color, labeled "Beirne, Maynard & Parsons, L.L.P." and "E"	3/13/2019
19	ES0019A	INV# 31058	Generic	T. Hofeller thumbdrive, silver in color, labeled "USDA Office of Diversity ASCR" and "B"	3/13/2019
20	ES0020A	INV# 31058	SanDisk	T. Hofeller thumbdrive, black and red in color, labeled "K" and "T"	3/13/2019
21	ES0021A	INV# 31058	Lexar	T. Hofeller thumbdrive, white & neon green in color, labeled "Q"	3/13/2019
22	ES0022A	INV# 31058	Generic	T. Hofeller thumbdrive, black and silver in color, labeled "Beirne, Maynard & Parsons, L.L.P." and "P"	3/13/2019

EXHIBIT 9

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
Case No. 18 CVS 014001

COMMON CAUSE, *et al.*

Plaintiffs,

v.

DAVID R. LEWIS, *et al.*

Defendants.

Expert Report of Douglas Johnson, Ph.D.

Pursuant to the North Carolina Rules of Civil Procedure and the Case Management Orders of the Court in the above-captioned matter, I, Douglas Johnson, provide the following written report:

26. This test map shifts the Senate map from 20 to 36 “Safe Republican” seats (with a 10% or higher Republican advantage). It reduces the number of “Safe Democratic” seats from 18 to 14. And it completely eliminates “Competitive” districts, moving all 12 of them into the “Safe Republican” category.

27. Focusing on Mecklenburg County is a good way to see at a glance the impact of the restraint on districting imposed by the “county grouping” rule and the Legislature’s criteria to minimize VTD and city splits and avoid extremely non-compact districts. The Legislature’s Adopted 2017 Map has five Senate districts contained entirely within Mecklenburg County, with one safe Republican district, three safe Democratic districts, and one competitive district. The county groupings rule and the criteria to minimize VTD splits and avoid extremely non-compact districts prevented the drawing of the map shown in the “Maximum Republican Test” – a map that divides Mecklenburg County among nine districts, with only one located entirely in the county; that reduces Democrats from three safe and one competitive districts to just one safe Democratic district, and a map that divides the rest of the county up among eight safe Republican districts:

switching from “Safe Democratic” districts to “Safe Republican” two districts in Mecklenburg County and one each in Forsyth and Buncombe counties.

29. While I have drawn the “Maximum Republican” Senate map for the illustrative purposes of this report, a “Maximum Republican” House map would similarly provide significantly more Republican districts in the State House than the 2017 Adopted Map provides.

30. This test map proves that the “county groupings” requirement significantly limits the legislature’s ability to draw lines based exclusively on partisanship.

31. Reflecting the direct influence of the “county groupings” requirement, the “Maximum Republican” test map bears significantly more resemblance in the odd shapes and partisan focus of the 2001 Senate map than it does to the 2017 Adopted. The 2001 Senate map is the map that was never used in an election because of the *Stevenson* ruling on the interpretation of the “county groupings” provision of the state constitution:

District 41 in 2018. The Pro-Republican Alternative’s 11.4% increase in the Republican character of District 41 (and resulting 11.4% decrease in the Democratic character, for a 22.8% total swing) would have resulted in an easy Republican win in 2018.

38. The 2017 Adopted Senate map in Mecklenburg County divided only 2 of the 195 VTDs in the county. The Pro-Republican Test map divides 15 VTDs, including one VTD divided into three pieces.

39. The lowest Polsby-Popper score of any 2017 Adopted Senate district in Mecklenburg County was 0.13, and the median of the 2017 Adopted Senate districts in the county was 0.25. In the Pro-Republican Test map, the median score is essentially unchanged at 0.26, and the lowest score is now 0.08. Reock compactness scores show a similar change, with the median declining from 0.42 in the 2017 Adopted Senate map to 0.35 in the Pro-Republican Test map, and the lowest score declining from 0.19 in the 2017 Adopted Senate map to 0.18 in the Pro-Republican Senate map.

Table 1: Mecklenburg County Compactness Scores

Dist	Pro-Rep. Test Map		2017 Adopted	
	Reock	Polsby-Popper	Reock	Polsby-Popper
37	0.35	0.26	0.42	0.25
38	0.37	0.49	0.42	0.42
39	0.28	0.26	0.33	0.24
40	0.52	0.47	0.47	0.36
41	0.18	0.08	0.19	0.13
Ave	0.34	0.31	0.37	0.28
Median	0.35	0.26	0.42	0.25
Sum	1.70	1.56	1.83	1.40
Min	0.18	0.08	0.19	0.13

Wake County

40. An analysis of House districts in Wake County also demonstrates the limitations on partisan gerrymandering imposed by the “county grouping” rule and by the Legislature’s criteria to minimize VTD and city splits and to avoid extremely non-compact districts. The 2017 Adopted

47. Once again, the state’s “county grouping” rule, and the legislature’s desire to minimize city splits, acted as limit on the potential partisan motivations of legislators in North Carolina.

Conclusion

48. These demonstration House and Senate maps drawn within individual county groupings, and the earlier demonstration “Maximum Republican” map drawn without regard to the county groupings, demonstrate that the 2017 Adopted House and Senate maps are not “maximum partisan” maps. Similar demonstration maps could be drawn for a “Maximum Republican” House map and for House and Senate districts in other multi-district county groupings.

49. The state’s county groupings rule acts as a significant restriction on the discretion, and potential excesses, of legislators when they are in charge of redistricting (regardless of party, as shown in 2001) While the 2017 map clearly includes partisanship as one consideration (as does every other legislatively-drawn redistricting map in the country), other traditional redistricting principles (preserving VTDs, avoiding city splits, keeping incumbents with their core constituencies, avoiding non-compact districts and other factors) all mitigated the partisan gain in the 2017 adopted map.

EXHIBIT 10

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
Case No. 18 CVS 014001

COMMON CAUSE, *et al.*

Plaintiffs,

v.

DAVID R. LEWIS, *et al.*

Defendants.

Expert Report of Dr. M.V. Hood III.

Pursuant to the North Carolina Rules of Civil Procedure and the Case Management Orders of the Court in the above-captioned matter, I, M.V. (Trey) Hood III, provide the following written report:

I. INTRODUCTION AND BACKGROUND

My name is M.V. (Trey) Hood III, and I am a tenured professor at the University of Georgia with an appointment in the Department of Political Science. I have been a faculty member at the University of Georgia since 1999. I also serve as the Director of the School of Public and International Affairs Survey Research Center. I am an expert in American politics, specifically in the areas of electoral politics, racial politics, election administration, and Southern politics. I teach courses on American politics, Southern politics, and research methods and have taught graduate seminars on the topics of election administration and Southern politics.

I have received research grants from the National Science Foundation and the Pew Charitable Trust. I have also published peer-reviewed journal articles specifically in the areas of redistricting and vote dilution. My academic publications are detailed in a copy of my vita that is attached to the end of this document. Currently, I serve on the editorial boards for *Social Science Quarterly* and *Election Law Journal*. The latter is a peer-reviewed academic journal focused on the area of election administration.

During the preceding four years, I have offered expert testimony (through deposition or at trial) in fourteen cases around the United States: *United States v. North Carolina*, 1:13-cv-861 (M.D. N.C.), *Bethune-Hill v. Virginia State Board of Elections*, 3:14-cv-00852 (E.D. Va.), *The Ohio Democratic Party v. Husted*, 2:15-cv-1802 (S.D. Ohio), *The Northeast Ohio Coalition v. Husted*, 2:06-cv-00896 (S.D. Ohio), *One Wisconsin Institute v. Nichol*, 3:15-cv-324 (W.D. Wis.), *Covington v. North Carolina*, 1:15-cv-00399 (M.D.N.C.), *Green Party of Tennessee v. Hargett*, 3:11-cv-00692 (M.D. Tenn.), *Vesilind v. Virginia State Board of Elections*, CL15003886-00 (Richmond Circuit Court), *Common Cause v. Rucho*, 1:16-cv-1026 (M.D.N.C.), *Greater*

Birmingham Ministries v. Merrill, 2:15-cv-02193 (N.D. Ala), *Anne Harding v. County of Dallas, Texas*, 3:15-cv-00131 (N.D. Tex.), *Feldman v. Arizona Secretary of State's Office*, 2:16-cv-16-01065 (Ari.), *League of Women Voters v. Gardner*, 226-2017-cv-00433 (Hillsborough Superior Court), and *Ohio A. Philip Randolph Institute v. Ryan Smith*, 1:18-cv-357 (S.D. Ohio).

In assisting the Legislative Defendants in analyzing the North Carolina's legislative districts, I am receiving \$350 an hour for this work and \$350 an hour for any testimony associated with this work. In reaching my conclusions, I have drawn on my training, experience, and knowledge as a social scientist who has specifically conducted research in the area of redistricting. My compensation in this case is not dependent upon the outcome of the litigation or the substance of my opinions.

II. STATE LEGISLATIVE REDISTRICTING IN NORTH CAROLINA

North Carolina relies on a unique system to draw state legislative districts that is based on multiple rigid criteria. To a large extent, these criteria make drawing state legislative districts in the Tar Heel state a formulaic exercise. The state constitution requires that House and Senate members be elected from districts and that, in the formation of such districts, counties must be kept whole.¹ This mandate has been translated into a system where counties are first grouped together and then districts are drawn within these groups.² In carrying out this mandate, districts should be limited to single counties or the minimum combination of contiguous counties necessary to draw equal-population districts.³ In drawing districts within multi-county groups in 2017, it was only permissible to traverse, or cross, a county boundary line once.⁴ County traversals are only permitted where necessary to comply with district population equalization.⁵ The county group system used by North Carolina acts as constraint on the discretion of line drawers.

Once the county groups have been established, in the case of any group that will contain more than one district, the map drawer is then required to create the requisite number of districts. Each county group comprising more than one district is, at this point, its own self-encapsulated geographic area for the purpose of drawing legislative districts. In other words, districts drawn in one county group are independent of districts in any other county group.

In addition to the county group rules discussed above, in 2017, the General Assembly also imposed other criteria on the drawing of legislative districts. These criteria include population equalization, contiguity, goals for compactness and VTD splits, the consideration of municipal boundaries, and incumbency protection.⁶ Taking into account all the criteria discussed, a map

¹See North Carolina Constitution, Article II, Sections 3 and 5. What is known as the whole county provision has been codified in state court opinions in a number of cases. For example, see *Stephenson v. Bartlett*, 355 N.C. 354 (2002). This provision does not supersede the federal dictate that districts, within a range of +/- 5%, must contain equal population counts.

²In some cases, a county group may be synonymous with a district.

³*Dickson v. Rucho*, 781 N.C. 404 (2015).

⁴2017 House and Senate Plans Criteria (Document Number: LDNC000302).

⁵*Stephenson v. Bartlett*, 355 N.C. 354.

⁶2017 House and Senate Plans Criteria (Document Number: LDNC000302). Partisan data, but not racial data, were considered in the creation of the 2017 House and Senate plans.

drawer creating district boundary lines within a county group is quite constrained as to the amount of discretion they may exercise. This is especially the case in county groups containing only a few districts.

In response to a federal court case, North Carolina was ordered to revise its House and Senate plans prior to the 2018 election-cycle.⁷ The resulting plans are the subject of litigation in the present matter. It should be noted that the plaintiffs in this matter are not challenging the county group mandate nor the current configuration of county groups in the House and Senate plans. In addition, the plaintiffs have only made allegations challenging certain House and Senate districts within the state. In the House, plaintiffs have made allegations challenging a total of 77 districts in eighteen county groups.⁸ In the Senate, they have made allegations challenging a total of 23 districts in seven county groups.

III. TRADITIONAL REDISTRICTING CRITERIA

In this section of my report, I examine the enacted House and Senate plans by analyzing a number of redistricting principles that were highlighted in the 2017 Redistricting Criteria by the General Assembly.

A. VTD Analysis

In this section, I make a number of comparisons concerning VTD splits across districts. According to the redistricting criteria, the 2017 House and Senate plans should make an effort to produce a plan that splits fewer precincts than the 2011 plans.⁹ Table 1 below details the number of VTD splits for the 2017 enacted plans, the 2011 benchmark plans, and Professor Chen's simulated legislative plans.¹⁰

⁷*Covington v. North Carolina*, 267 F. Supp. 3d 664 (M.D.N.C. 2017).

⁸Although House Districts 21, 22, 57, 61, and 62 are located in county groups with other districts about which Plaintiffs have made allegations, Plaintiffs have made no specific allegations challenging these districts,

⁹2017 House and Senate Plans Criteria (Document Number: LDNC000302).

¹⁰North Carolina General Assembly, Redistricting Office and Expert report of Jowei Chen (April 8, 2019), Tables 5 and 6.

greater number of Republican incumbents paired in the Senate plan under which the election was held—a total of eight compared to only two Democrats.

To summarize, in both the House and Senate plans, the goal of limiting the number of incumbent pairings of either party was clearly achieved.

Table 5. Incumbent Pairings. 2018

Pairings	House		Senate	
	2017 Enacted	2018 Elections	2017 Enacted	2018 Elections
D, R	0.8% [1]	0.8% [1]	2.0% [1]	4.0% [2]
D, D	0.0% [0]	0.8% [1]	0.0% [0]	0.0% [0]
R, R	0.8% [1]	0.8% [1]	6.0% [3]	6.0% [3]
Open	1.7% [2]	2.5% [3]	8.0% [4]	10.0% [5]
Unpaired	96.7% [116]	95.0% [114]	84.0% [42]	80.0% [40]
Total Seats	120	120	50	50

D. Summary

The 2017 House and Senate plans met the goals stated in the adopted redistricting criteria. Compared to the 2011 plans, the 2017 plan saw measurable gains in terms of district compactness and reducing VTD splits as compared to the 2011 plans. The simulations prepared by Professor Chen that were designed to maximize these criteria perform only marginally better on these factors. In addition, the goal of protecting incumbents specified in the criteria was also met as very few House and Senate incumbent members, of either party, were paired in 2017. These factors, combined with the successful implementation of the county grouping system and the condition permitting only a single internal traverse, also meant respect for county boundaries was paramount in the plan’s creation. In addition, all House and Senate districts are contiguous and meet the equal population standard as defined by the criteria. These goals, in my opinion, are certainly not partisan in nature. In using a different set of criteria from that adopted by the General Assembly, Professor Chen infers that any deviation from maximization of these factors is an indication of improper partisan motives. In my opinion, imputing motives based on the application of a different set of criteria in no ways proves the General Assembly was engaged in an effort to engage in extreme partisan gerrymander. As indicated in my discussion of the legislative redistricting in North

Carolina, the process is quite constrained, which greatly limits the ability of map drawers to create districts where partisan motives predominate.

created by dividing the voting age population contained within each VTD by the area of the VTD (measured in square miles). I then created a new indicator by subtracting values on the partisan index from one. In this model, higher values indicate increasing Democratic vote strength. In order to test the relationship between population density and Democratic partisanship, I used OLS regression. The results are found in Table 13 below.³⁵

Table 13. Explaining Democratic Partisanship

	Coefficient	Standard Error
Population Density	.00009*	.000003
Constant	.4294*	.0043
R ²	.22	
N	2,692	

*p<.001

As indicated by the results in the table, population density is a significant predictor of Democratic vote strength in North Carolina. As population density increases, so does Democratic partisanship. Stated otherwise, Democrats in the state are more likely to be located in urban areas. Of course, this is just further statistical confirmation of the spatial patterns that were previously discussed.

To recap, this section has demonstrated that North Carolina’s political geography can affect the manner in which legislative districts are created. Geographically speaking, Republican areas tend to cluster with other Republican areas and Democratic areas tend to be located alongside other Democratic areas. As well, Democrats are more likely to found in urban areas and Republicans in rural areas. As a consequence of this pattern, Republicans possess a larger geographic footprint in the state than do Democrats. The presence of such spatial patterns can lead to the phenomenon where voters with similar voting patterns are more likely to be placed together in the same district, sometimes referred to as *natural* packing.

³⁵Alternative model specifications using the logged value of population density and weighting observations by VAP revealed the same pattern as that presented in Table 13.

EXHIBIT 11

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF
JUSTICE
SUPERIOR COURT DIVISION
FILE NO.: 18 CVS 014001

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.

EXPERT REPORT OF THOMAS BRUNELL, Ph.D.

Pursuant to the North Carolina Rules of Civil Procedure and the Case Management Orders of the Court in the above-captioned matter, I, Thomas Brunell, provide the following written report:

I am a Professor of Political Science at the University of Texas at Dallas. I received a Ph.D. in political science from the University of California, Irvine in 1997. I have published a book and dozens of refereed journal articles on redistricting, elections, and representation. My research has been published in, among other outlets, the *American Political Science Review*, the *Journal of Politics*, *Electoral Studies*, *Election Law Journal*, and *Legislative Studies Quarterly*. A copy of my curriculum vitae, which lists my publications in the last ten years, is attached.

Over the past seven years, I have provided testimony in the following cases: *Dickson v. Rucho* (NC), *Guy v. Miller* (NV), *Egolf v. Duran* (NM), *Backus*

is a far cry from maximizing compactness. Thus, the goals in the simulated maps and the enacted maps are not aligned and this presents problems for making comparisons.

The same caveat applies to Prof. Chen's treatment of splitting voting tabulation districts (VTDs). His computer program tried to minimize these while the legislature was instructed to "make reasonable efforts to draw legislative districts in the 2017 House and Senate plans that split fewer precincts than the current legislative redistricting plans" (Ex 37). By instructing the computer to split the minimum number of VTDs this may have affected the overall results of Prof. Chen's comparison maps.

Prof. Chen argues that his method allows him to draw conclusions about the intent of the map-makers. More specifically he believes that his outlier analysis is able to prove that "an overriding partisan intent" rather than "follow[ing] non-partisan districting criteria" (page 10) underlies the motivations of the person or persons who drew the boundaries. Divining the intent of the map-maker is extraordinarily difficult because the process of redistricting is complex. There are a multitude of competing demands at work when lines are being drawn – districts have to be nearly equally populated; districts need to be compact and contiguous; incumbents' districts can be preserved; city and county splits need to be minimized; North Carolina's county grouping rules must be complied with, and so on. Beyond these requirements there can be various other factors that affect where the boundaries are placed. Incumbents regularly make requests with regard to their district including preserving their core constituency and more. For instance,

legislators may ask that their parents' house, or children's house be included in their district. Or they might ask that a specific business, or park, or landmark be drawn inside their district. Changes in one district can require adjustments to nearby districts if the initial changes affect the population totals. The complex process of redistricting makes drawing conclusions about the intent of the map-maker through statistical analyses incredibly difficult.

North Carolina's redistricting process is one of the most constrained in the nation due to the county groupings requirements. This additional requirement significantly restricts the universe of possible districts. Further, the county groupings rules appear to advantage the Republican Party because the vast majority of Democratic voters in the state reside in the most heavily populated counties, while Republicans are advantaged in rural counties. Table 1 contains the Democratic margin of victory in the 2016 presidential election for the seven most populated counties in North Carolina. Hillary Clinton's margin of victory ranges from 10.37 percent to 59.5 percent in these counties. If the county groupings rules did not exist, more Democratic leaning districts could be drawn by using Democratic population in heavily populated districts mixed in with more rural areas in contiguous districts. So Democrats are disadvantaged by these rules as it limits the number of Democratic leaning districts that are theoretically possible.

Table 1. Democratic Support in the Most Heavily Populated Counties

County	Population Rank	2016 Presidential Democratic Margin
Mecklenburg	1	29.41
Wake	2	20.21
Guilford	3	19.89
Forsyth	4	10.37
Cumberland	5	15.95
Durham	6	59.5
Buncombe	7	14.20

*Source https://ballotpedia.org/Pivot_Counties_in_North_Carolina and <http://worldpopulationreview.com/us-counties/nc/>

Table 2 presents additional data on this point. Again from the 2016 election, Hillary Clinton received over 50 percent of all of her votes in North Carolina from just seven of the 100 counties in the state. Compare this to Table 3 which has the data from Donald Trump. He did not reach 50 percent of his total statewide vote until we add the top 17 counties in the state. The Democratic support is far more highly concentrated for Democrats in North Carolina compared to Republicans.

Table 2. Counties and Votes for Clinton from 2016 Election

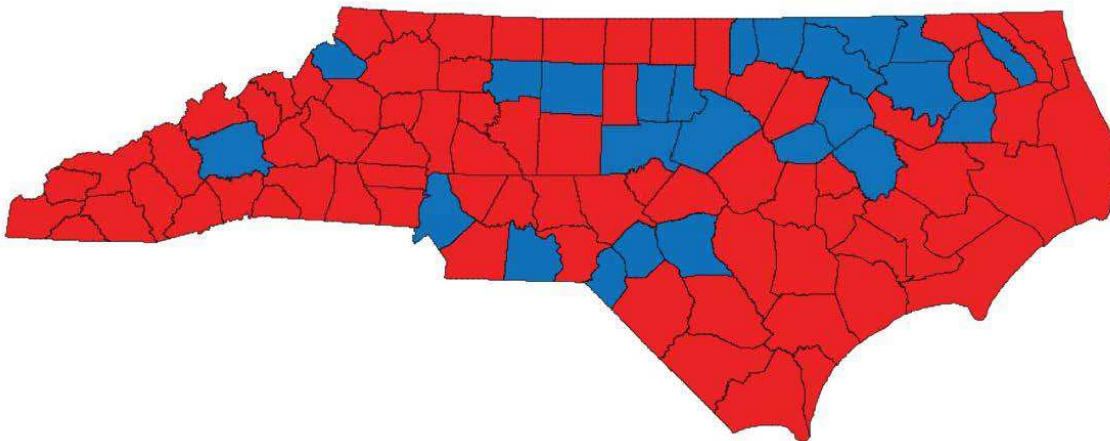
County	Votes for Clinton	Cumulative Votes	Cumulative Percent
Wake	302,736	302,736	13.83%
Mecklenburg	294,562	597,298	27.28%
Guilford	149,248	746,546	34.10%
Durham	121,250	867,796	39.64%
Forsyth	94,464	962,260	43.95%
Buncombe	75,452	1,037,712	47.40%
Cumberland	71,605	1,109,317	50.67%
Total Votes	2,189,316		

Table 3. Counties and Votes for Trump from 2016 Election

County	Votes for Trump	Cumulative Votes	Cumulative Percent
Wake	196,082	196,082	8.30%
Mecklenburg	155,518	351,600	14.88%
Guilford	98,062	449,662	19.03%
Forsyth	75,975	525,637	22.25%
Union	66,707	592,344	25.07%
Gaston	61,798	654,142	27.69%
Buncombe	55,716	709,858	30.05%
New Hanover	55,344	765,202	32.39%
Iredell	54,754	819,956	34.71%
Johnston	54,372	874,328	37.01%
Davidson	54,317	928,645	39.31%
Cabarrus	53,819	982,464	41.58%
Cumberland	51,265	1,033,729	43.75%
Randolph	49,430	1,083,159	45.85%
Catawba	48,324	1,131,483	47.89%
Rowan	42,810	1,174,293	49.70%
Brunswick	42,720	1,217,013	51.51%
Total Votes	2,362,631		

Finally, in Figure 1, the results of the 2016 presidential election by county in North Carolina demonstrate this phenomenon as well. Trump carried far more counties than Clinton, though he only carried the state by less than 200,000 votes. Democratic support is largely concentrated in the most heavily populated counties.

Figure 1. 2016 Presidential Election Voting by County



* Figure is coded blue for counties that Hillary Clinton carried in the 2016 presidential election, and red for the counties that Donald Trump carried.

EXHIBIT 12

STATE OF NORTH CAROLINA
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
COUNTY OF WAKE

Common Cause, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Docket No. 18 CVS 014001
)	
Representative David R. Lewis, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF JANET R. THORNTON, Ph.D.

STATE OF FLORIDA)	
)	ss.
COUNTY OF LEON)	

Dr. Janet R. Thornton, affiant, affirms under oath as follows:

1. I am a Managing Director at Berkeley Research Group (BRG), a consulting firm specializing in the application of economic, econometric, and statistical analysis to litigation, regulatory compliance, and risk assessment matters, among other specialties. BRG experts have analyzed data for matters involving firms in many sectors, government entities, as well as institutions of higher education and research. My fields of special interest include computer analysis of large databases, applied econometrics and statistical analysis.

2. I received doctoral and master's degrees in economics from The Florida State University, and a bachelor's degree from the University of Central Florida in economics and political science.

3. I am a member of the American Economic Association and the National Association of Forensic Economics.

compared to the enacted map. The results of the simulations are not informative because the premise of their simulated maps is incomplete and inaccurate. Each expert has added error to his results by not following the actual criteria used in constructing the enacted map.

32. The following summarizes the actual criteria utilized by the legislature in constructing the enacted map:⁸

Equal Population. The Committees shall use the 2010 federal decennial census data as the sole basis of population for drawing legislative districts in the 2017 House and Senate plans. The number of persons in each legislative district shall comply with the +/- 5 percent population deviation standard established by *Stephenson v. Bartlett*, 355 N.C. 354, 562 S.E. 2d 377 (2002).

Contiguity. Legislative districts shall be comprised of contiguous territory. Contiguity by water is sufficient.

County Groupings and Traversals. The Committees shall draw legislative districts within county groupings as required by *Stephenson v. Bartlett*, 355 N.C. 354, 562 S.E. 2d 377 (2002) (*Stephenson I*), *Stephenson v. Bartlett*, 357 N.C. 301, 582 S.E.2d 247 (2003) (*Stephenson II*), *Dickson v. Rucho*, 367 N.C. 542, 766 S.E.2d 238 (2014) (*Dickson I*) and *Dickson v. Rucho*, 368 N.C. 481, 781 S.E.2d 460 (2015) (*Dickson II*). Within county groupings, county lines shall not be traversed except as authorized by *Stephenson I*, *Stephenson II*, *Dickson I*, and *Dickson II*.

Compactness. The Committees shall make reasonable efforts to draw legislative districts in the 2017 House and Senate plans that improve the compactness of the current districts. In doing so, the Committees may use as a guide the minimum Reock (“dispersion”) and Polsby-Popper (“perimeter”) scores identified by Richard H. Pildes and Richard G. Neimi in *Expressive Harms, "Bizarre Districts," and Voting Rights: Evaluating Election-District Appearances After Shaw v. Reno*, 92 Mich. L. Rev. 483 (1993).

Fewer Split Precincts. The Committees shall make reasonable efforts to draw legislative districts in the 2017 House and Senate plans that split fewer precincts than the current legislative redistricting plans.

Municipal Boundaries. The Committees may consider municipal boundaries when drawing legislative districts in the 2017 House and Senate plans.

Incumbency Protection. Reasonable efforts and political considerations may be used to avoid pairing incumbent members of the House or Senate with another incumbent in legislative districts drawn in the 2017 House and Senate plans. The

⁸ Bates Number LDNC1883.

39. Dr. Chen's code for acceptance of a map states, "save this plan if it has the lowest t-score."¹⁴ The t-score is only a mathematically convenient criterion introduced by Dr. Chen to generate his maps.

40. In addition to including compactness to construct the t-score, Dr. Chen also included a measure for the splitting of precincts and municipalities as part of the score. The criteria established for the 2017 enacted plan do not state that the goal is to avoid the splitting of precincts and municipalities. Instead, the 2017 enacted plan was constructed to have fewer precinct splits than the prior plan in the districts that were to be redrawn and stated that municipal boundaries could be taken into consideration.

41. A t-score evaluation was not among the actual criteria relied upon for the creation of the 2017 enacted map. To create the t-score that he uses to evaluate a map, Dr. Chen subtracts the Reock and Polsby-Popper scores from 1.75. Dr. Chen does not explain why he decided to use 1.75, but were he to change the 1.75 to another number, he would derive a different t-score by which to evaluate each simulated map. As a consequence, Dr. Chen is able to influence the simulated maps that he accepts and rejects.

42. If Dr. Chen had applied the actual criteria utilized by those who constructed the enacted map, he presumably would have generated a different set of maps. The resulting maps would have been the more relevant simulations to compare to the enacted map to assess partisan bias. Dr. Chen's modification of the actual criteria results in making apples and oranges

¹⁴ See for example code from Dr. Chen's file, NCU_BASE_SET1.JAVA:
double t_score = (1+tmcdfrags-ALLmcds.size()+ tvtdfrags-ALLvtlds.size()) * (new Double(1.75)-reock-polsby); //lower is better
if(t_score<low_score){ low_score=t_score; Dpcts=makeCopy(districts, t_Dpcts);
Dpops=(int[])t_Dpops.clone(); } **//save this plan if it has the lowest t_score**
System.out.println("tctyfrags: "+tctyfrags+" tmcdfrags: "+tmcdfrags+" tvtdfrags: "+tvtdfrags+" reock:
"+reock+" polsby: "+polsby+" t_score: "+t_score+" try: "+t);
System.out.println("====="); break; //System.exit(0);

two of the elections are considered. These data illustrate the relevance of the input data that is used to assess the simulations relative to the enacted map. While the average seat shift does not change for the Senate Democratic seats when the 10 elections are considered, the relevance of the input data is still pertinent as shown by the two elections for which Dr. Mattingly estimates neither an excess or shortfall in the number of Senate Democratic seats.

Table 7—Estimated Democratic House Seats Calculated by Dr. Mattingly When the Elections are Restricted to Those Considered by the Legislature

Election	Simulated Maps	Enacted Map	Difference	Simulated Maps	Enacted Map	Difference
USS10	36	39	-3	36	39	-3
GV12	39	43	-4	39	43	-4
LG16	43	42	1	43	42	1
USS16	43	42	1	43	42	1
PR12	46	43	3	46	43	3
USS14	47	45	2	47	45	2
PR16	48	45	3	48	45	3
PR08	49	44	5			
LG12	50	48	2	50	48	2
AG16	50	44	6	50	44	6
GV16	51	47	4	51	47	4
CI12	56	51	5			
LG08	63	56	7			
IC08	65	57	8			
GV08	66	62	4			
USS08	71	60	11			
AG08	94	92	2			
Overall	53.9	50.6	3.35	45.3	43.8	1.5

VI. Conclusion

93. None of the three Plaintiffs’ experts apply the same criteria that were used to construct the enacted map. A researcher’s choice of simulation criteria alone will influence the resulting simulations. Additionally, the outcome is influenced by the expert’s choice of election

EXHIBIT 15



NORTH CAROLINA GENERAL ASSEMBLY

June 27, 2017

VIA HAND DELIVERY

Dr. Thomas Hofeller

Dear Dr. Hofeller:

We require your professional assistance. The General Assembly will be drawing new legislative redistricting maps to include both House and Senate districts pursuant to an order from a federal district court. Based on your knowledge and experience, we believe you are best qualified to produce such maps. Therefore, we offer to engage you to produce such maps for possible presentation to the House and Senate Redistricting Committees for their consideration and ultimate use by the General Assembly.

OUR OFFER OF ENGAGEMENT IS SUBJECT TO THE FOLLOWING TERMS:

- You will produce a map of 120 House districts and a map of 50 Senate districts in North Carolina that complies with criteria adopted by the House and Senate Redistricting Committees (the "Committees"). The maps you produce may be presented to the Committees, the General Assembly or any third party in the sole discretion of the Co-Chairs.
- As a legislative contractor and consultant, your work will be subject to legislative confidentiality as prescribed by Article 17 of Chapter 120 of the General Statutes. Your work may also be subject to the doctrine of legislative privilege as provided by the common law in North Carolina. By directive of the Committees, these protections will accrue to the benefit of the Co-Chairs of the Committees, and the Co-Chairs shall have the sole discretion to grant any request for their waiver. Finally, and notwithstanding the foregoing, all drafting and information requests to you and documents prepared by you concerning redistricting shall no longer be confidential and shall become public records upon the act establishing the relevant district plan becoming law.
- To allow us and you to better to predict the cost of this engagement, we are prepared to offer compensation to you in the form of a flat fee equal to \$50,000.00 payable upon

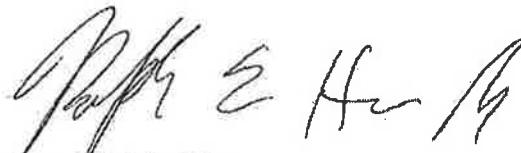
LDNC001879

receipt by the Legislative Services Officer of an invoice from you for work performed and upon prior approval from the President Pro Tempore of the Senate and the Speaker of the House.

Should the terms of this engagement be acceptable to you, please indicate your acceptance in the space marked below. We appreciate your willingness to serve in this manner, and we look forward to working with you pursuant to the Committees' directive.

Sincerely,


Rep. David Lewis


Sen. Ralph Hise

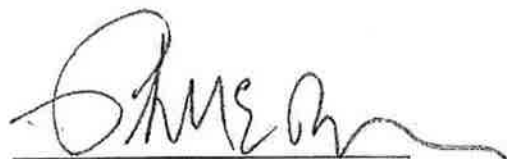
Enclosures

Agreed and Accepted to by:


Dr. Thomas Hofeller

Date: June 27, 2017

Agreement Authorized and Approved:


Sen. Phil Berger
President Pro Tempore



Rep. Tim Moore
Speaker

EXHIBIT 16

From: Jones, Stanton
Sent: Tuesday, April 9, 2019 5:03 PM
To: Strach, Phillip J.; John Branch
Cc: Cox, Paul; Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; Denton Worrell; Nate Pencook; Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Gersch, David P.; Theodore, Elisabeth; Jacobson, Daniel
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance
Attachments: Index -- HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY.zip

Phil:
Because Legislative Defendants and Intervenor Defendants have refused our proposed filtering approach, and because we are now awaiting the Court's resolution of this issue, we have not actually conducted the filtering. As such, we do not know the volume of data that will remain after filtering.

While we have not received an index for all the materials that were produced in response to the subpoena, we have received a partial index of file names and file paths for some of those materials. I've attached that partial index.

Please note that, because some of the file names and file paths in this partial index indicate personal sensitive information of Dr. Hofeller and his family, we have marked the index at HIGHLY CONFIDENTIAL / OUTSIDE ATTORNEYS' EYES ONLY pursuant to Paragraph 3 of the Consent Protective Order.

Regards,
Stanton

From: Strach, Phillip J. [mailto:phil.strach@ogletree.com]
Sent: Thursday, April 04, 2019 11:39 AM
To: Theodore, Elisabeth; John Branch
Cc: Jacobson, Daniel; Jones, Stanton; Cox, Paul; Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; Denton Worrell; Nate Pencook; Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Gersch, David P.
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Elisabeth:

As I've previously noted we oppose any filtering but we won't know when we can respond to your motion until we've seen it. In the meantime, please let us know how much data is in the non-filtered materials and also send us an index of the files.

Thanks.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

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

Sent: Thursday, April 04, 2019 10:13 AM

To: John Branch <JBranch@shanahanlawgroup.com>

Cc: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Cox, Paul <pcox@ncdoj.gov>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Denton Worrell <DWorrell@shanahanmcdougal.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Gersch, David P. <David.Gersch@arnoldporter.com>

Subject: Re: Common Cause v. Lewis -- notice of subpoena compliance

John, apologies for the multiple emails. One amendment to my prior email -- Stroz has informed us that if the court does permit the filtering, then they could likely arrange it so that your vendor is present to observe the filtering process if that's what you want for comfort as to the process. As I mentioned, we will get the motion on file.

Best,
Elisabeth

On Apr 4, 2019, at 9:29 AM, Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com> wrote:

John, thanks for your response. We understand your position on the filtering, but as mentioned, this is something that we are going to bring to the court for resolution. It is apparent that much of this process will depend on the court's answer to whether we can filter, and therefore we believe it is most efficient to receive an answer from the court on that and then work out the mechanics of the copying process after. To clarify, though, if the court permits us to do the filtering, that would mean that our vendor would perform the filtering in its lab on its own, create a new image of just the non-filtered items, and then provide your vendor access to that new image.

Pursuant to the court's case management order, could you tell us by 2 pm today if you will respond to the motion regarding the filtering, how many days you would like to respond, and your availability for a hearing next week if the court decides to hold a hearing?

Best,
Elisabeth

On Apr 3, 2019, at 5:24 PM, John Branch <JBranch@shanahanlawgroup.com> wrote:

Dan,

Thanks for the information on the lack of objections and the date of receipt.

The rule provides that we get access to what you all received, without filtering. I am not saying that there is no possible limitation at all on the use of the information, especially since I have not seen the content of the drives. However, to the extent that Plaintiffs received the drives we get to inspect and copy the entirety of what Plaintiffs have.

Also, let me know what potential costs you all are concerned about on your end. I'm not sure I understand where they will come from given that Plaintiffs would simply be making the drives available to our vendor to copy at Plaintiffs' vendor's location, but I could be missing something.

Best regards,

John

John E. Branch III | Partner

<image001.png>

128 E. Hargett Street | Third Floor
Raleigh, NC 27601

Phone: (919) 856-9494

Email: jbranch@shanahanlawgroup.com

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From: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Sent: Wednesday, April 3, 2019 12:33 PM

To: John Branch <JBranch@shanahanlawgroup.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>; Cox, Paul <pcox@ncdoj.gov>

Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D.

<Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark

<MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar

<amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Denton Worrell <DWorrell@shanahanmcdougal.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

John,

Thanks for your response. With respect to the issue of copying, if we are understanding your email, you are asking for your vendor to go the office of our vendor (Stroz Friedberg) in Washington, DC, and make a copy of all of the hard drives and thumb drives on site yourself, without taking the originals of the drives. Is that correct? If so, we are amenable to that approach (subject to resolution of the separate issue of the medical and other personal files, discussed below), but that is different from what we interpreted Phil as proposing yesterday. If we went this route, we would pass on any costs that we and Stroz incur in facilitating this process. John and Phil, could you each let us know if this approach is acceptable to you? And Paul, if the Intervenor Defendants and Legislative Defendants are making their own copies on site at Stroz in DC, please let us know how the State Defendants would like to proceed.

John, your email does not address the issue of filtering out medical and sensitive personal information, without any party reviewing it or any further dissemination. Could you please let us know Intervenor-Defendants position on this issue? As for your other questions, we explained several emails down on this chain (on which you were copied) that we received the materials from Ms. Lizon on March 13. Per the attached, the subpoena to Ms. Lizon was issued on February 13, several weeks before the intervenors became parties to the case. Neither Ms. Lizon nor any party asserted any objections to the subpoena.

Bet,
Dan

[Daniel Jacobson](#)
Senior Associate

Arnold & Porter
601 Massachusetts Ave., NW
Washington | District of Columbia 20001-3743
T: +1 202.942.5602
Daniel.Jacobson@arnoldporter.com | www.arnoldporter.com

From: John Branch <JBranch@shanahanlawgroup.com>
Sent: Wednesday, April 3, 2019 11:37 AM
To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>; Cox, Paul <pcox@ncdoj.gov>
Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Denton Worrell

<DWorrell@shanahanmcdougal.com>; Nate Pencook
<NPencook@shanahanlawgroup.com>; Eddie Speas <espeas@poynerspruill.com>;
Mackie, Caroline P. <CMackie@poynerspruill.com>;
zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>;
melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>;
Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth
<Elisabeth.Theodore@arnoldporter.com>

Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Stanton,

I don't think you are correct in your reading of Rule 45(d1). Under the rule, Defendants have an opportunity to both inspect and copy the hard drives and thumb drives you received. Rule 45(d1) states:

(d1) Opportunity for **Inspection** of Subpoenaed Material. - A party or attorney responsible for the issuance and service of a subpoena shall, within five business days after the receipt of material produced in compliance with the subpoena, serve all other parties with notice of receipt of the material produced in compliance with the subpoena and, upon request, shall provide all other parties a reasonable opportunity to **copy and inspect** such material at the expense of the inspecting party.

(emphasis added). Thus, under Rule 45(d1), Defendants have an opportunity to both inspect and make copies of the materials you have received. Plaintiffs must provide such an opportunity to Defendants. Inspection of the drives Plaintiffs received pursuant to the subpoena is expressly provided for under Rule 45(d1), and Defendants are well within their rights to both ask to inspect the drives and make their own copies of them. This is only logical – it would be inherently unfair for any party to receive items and information pursuant to a subpoena but then not make them available to all parties in the litigation.

Intervenor-Defendants are hereby exercising their right for a reasonable opportunity to inspect and copy the four hard drives and eighteen thumb drives produced by Ms. Lizon. We request either that you provide the original hardware that you received to our vendor for copying or that you allow our vendor to copy the hardware on site.

In addition, while it is possible I was not copied on earlier emails due to our later entry in the case, it is unclear to me when Ms. Lizon provided the drives to Plaintiffs, how they were sent to you all, and whether she asserted any objections or other rights in responding to the subpoena or searching for responsive documents. Accordingly, please provide us with any correspondence exchanged between Plaintiffs' counsel and Ms. Lizon regarding the subpoena and identify the date or dates on which Plaintiffs received the four hard drives and eighteen thumbdrives produced in response to the subpoena.

Best regards,

John Branch

John E. Branch III | Partner

<image001.png>

128 E. Hargett Street | Suite 300
Raleigh, NC 27601

Phone: (919) 856-9494

Email: jbranch@shanahanlawgroup.com

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From: Jones, Stanton [<mailto:Stanton.Jones@arnoldporter.com>]
Sent: Wednesday, April 03, 2019 8:59 AM
To: Strach, Phillip J. <phil.strach@ogletree.com>; Cox, Paul <pcox@ncdoj.gov>
Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanlawgroup.com>; Denton Worrell <DWorrell@shanahanmcdougal.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Phil, if I'm understanding your email correctly, you are asking us to give you the originals of the media (i.e., the original hard drives and thumb drives we received from Ms. Lizon). Please let us know if that's not what you are requesting, but if it is, that is not something we are under any obligation to do. If you have authority to the contrary, please let us know. We believe our obligation is to provide you with copies of the materials we received in response to the subpoena, and the most straightforward way to do that is for our vendor to make forensically sound copies and send them to you or

your vendor. Indeed, we note that this is exactly the procedure you are following with respect to our request to copy and inspect the General Assembly computer purportedly used to create the 2017 plans.

With respect to filtering out sensitive personal information, we intend to go to the court on that. We will file a motion with the court requesting permission to follow the approach we have proposed, but if the court does not authorize such and instead orders us to provide you complete copies of everything on the media, including the sensitive and irrelevant personal information, we will of course comply with the court order.

We would like to make our motion swiftly to facilitate the provision of this material to you and to the State Defendants as quickly as possible; we would have made the motion last week, when we first proposed the filtering process, if we had received your response at that time. We asked you yesterday to advise us of when you would like to file a response to our motion, and when you are available for a telephonic hearing, but have not heard back on those questions. Please let me know by 2pm today when you would like to file a response, and when you are available for a hearing. We can be available Monday or Tuesday of next week.

Regards,
Stanton

From: Strach, Phillip J. [<mailto:phil.strach@ogletree.com>]
Sent: Tuesday, April 02, 2019 5:30 PM
To: Jones, Stanton; Cox, Paul
Cc: Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; John Branch; dworrell@shanahanmcdougal.com; Nate Pencook; Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel; Gersch, David P.; Theodore, Elisabeth
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Stanton,

The Rules require plaintiffs to allow us a “reasonable opportunity to copy and inspect such material at the expense of the inspecting party.” We will of course bear the expense of any copy we make for our own use. We can provide you the name and address of our vendor to which the files can be sent to make our copy. In the alternative, we can have the vendor go to your site to retrieve the materials. We do not have any other cost-sharing obligations beyond that based on the plain text of the rule. The Rule also does not provide for a party filtering the data it received from a subpoena prior to making it available for inspection and copying. There is no basis for your refusal to allow us to inspect and copy all of the material as the Rule allows. Please confirm that you will allow us to make this inspection and copying and we will immediately provide you with instructions for shipping the materials to our vendor for copying (or alternatively make arrangements to retrieve the materials).

Thanks.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax:

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>
Sent: Tuesday, April 02, 2019 9:52 AM
To: Strach, Phillip J. <Phil.Strach@ogletreedeakins.com>; Cox, Paul <pcox@ncdoj.gov>
Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencook <NPencook@shanahanmcdougal.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Phil, your email below raises two issues.

First, on the issue of cost, Rule 45(d1) of the North Carolina Rules of Civil Procedure expressly states that our obligation is to copy and provide the materials we received in response to our subpoena "at the expense of the inspecting party." To my knowledge, we have no obligation to copy and provide these materials unless and until you (and others who have requested copies) agree to bear the expense. If you have a different understanding, please provide authority for it. Alternatively, let us know if legislative defendants agree to bear the expense per Elisabeth's email below. Note that state defendants have already agreed to split the quoted expense with legislative defendants.

Second, on the issue of medical and other apparently sensitive personal information, we fail to see how it is in anyone's interest to copy and disseminate such information, which obviously has no bearing on this case but raises serious privacy concerns. We would be happy to send you a list of the keywords we would use to search file and folder names for materials we would segregate out and not review or disseminate.

Please let us know by 6:30pm ET today whether legislative defendants will revisit their position on both issues and agree to our approach. If you do not consent to this approach, we will file a motion seeking clarification as to the cost issue and the court's approval to follow our approach on the second issue. Pursuant to the March 13 Case Management Order, please let us know by 6:30pm ET today when you would like to file a response to our motion and also your availability for a hearing on the motion early next week.

Regards,
Stanton

From: Strach, Phillip J. [<mailto:phil.strach@ogletree.com>]
Sent: Monday, April 01, 2019 9:05 PM
To: Cox, Paul; Theodore, Elisabeth; Jones, Stanton
Cc: Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard;

Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; John Branch;
dworrell@shanahanmcdougal.com; Nate Pencook; Eddie Speas; Mackie, Caroline P.;
zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel;
Gersch, David P.

Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Elisabeth: we do not agree with the proposed process or the splitting of the costs. We believe plaintiffs should comply with the North Carolina Rules of Civil Procedure and produce to us all of the subpoenaed files, without filtering. We are capable of protecting the confidentiality of the materials. Cost-shifting can occur after the final judgment in the case. Please produce these files immediately. Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax:
919-783-9412

phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

From: Cox, Paul <pcox@ncdoj.gov>

Sent: Monday, April 01, 2019 12:10 PM

To: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jones, Stanton
<Stanton.Jones@arnoldporter.com>; Strach, Phillip J.
<Phil.Strach@ogletreedeakins.com>

Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D.

<Michael.McKnight@ogletreedeakins.com>; Braden, E. Mark

<MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar

<amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>;

Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch

<JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencook

<NPencook@shanahanmcdougal.com>; Eddie Speas <espeas@poynerspruill.com>;

Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com;

melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>;

Gersch, David P. <David.Gersch@arnoldporter.com>

Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Elisabeth,

Thank you for this additional info and clarification.

The State Defendants would be willing to split with the Legislative Defendants the quoted cost for a copy of the materials.

Paul

<image002.jpg>

Paul M. Cox

Special Deputy Attorney General

Phone: (919)716-6932

pcox@ncdoj.gov

114 W. Edenton St., Raleigh, NC 27603

Please note messages to or from this address may be public records.

From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Sent: Thursday, March 28, 2019 3:45 PM
To: Cox, Paul <pcox@ncdoj.gov>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>
Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedekins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencook <NPencook@shanahanmcdougal.com>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Hi Paul,

We've now received the cost estimate from our vendor, which is \$3500 to \$4000 total for creating two copies (one for the State Defendants and one for the Legislative Defendants). That does not include the cost of processing the data or performing the keyword searching to filter out sensitive documents as described in the prior email; it is just the cost of creating physical images of each of the 22 external drives after the filtering is complete. The cost of the copying is driven largely by the size of the materials and the cost of creating images of physical drives. The size of the materials makes it infeasible to send via FTP. Let us know if you would like to discuss this further.

Legislative Defendants – please let us know whether you agree to the process we have proposed and to splitting the cost, or if you would like to discuss.

Best,
Elisabeth

From: Cox, Paul [<mailto:pcox@ncdoj.gov>]
Sent: Thursday, March 28, 2019 10:01 AM
To: Theodore, Elisabeth; Jones, Stanton; Strach, Phillip J.
Cc: Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; John Branch; dworrell@shanahanmcdougal.com; Nate Pencook; Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel; Gersch, David P.
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Hi Elisabeth,

This plan seems reasonable to the State Defendants. We're really only interested in having a copy of whatever information that the plaintiffs retain from the subpoena. Once you decide what you believe is properly the subject of discovery, we can send you an FTP link or work out some other means of transferring the files. We

can agree to treat all of the documents as confidential when so designated. I'm not sure what cost would be involved in transferring a copy of the files that you are already processing for your own purposes. We're happy to discuss to better understand.

Paul

<image002.jpg> **Paul M. Cox**
Special Deputy Attorney General
Phone: (919)716-6932
pcox@ncdoj.gov
114 W. Edenton St., Raleigh, NC 27603

Please note messages to or from this address may be public records.

From: Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>
Sent: Wednesday, March 27, 2019 5:27 PM
To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <phil.strach@ogletree.com>
Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedekins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencook <NPencook@shanahanmcdougal.com>; Cox, Paul <pcox@ncdoj.gov>; Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Counsel:

In the course of our vendor's processing of the materials we received in response to our subpoena of Ms. Lizon, it has become apparent from the file and folder names that those materials may include personal information, such as tax returns and medical and family information. We have not opened any of these files and will not do so. Because the files at issue appear from their names to be sensitive, personal, and plainly irrelevant to the litigation, we do not believe that it would be appropriate or in the interest of any party to further disseminate these files. In light of Legislative Defendants' and State Defendants' requests for copies of the materials, we would propose the following approach.

First, our vendor Stroz would search for keywords in file and folder names that would indicate that the underlying document contains personal information, such as "tax," "medical," and the names of Dr. Hofeller's family. Our vendor would then pull out these personal files and then make a copy of everything that remains, and provide you with that copy.

Second, because the keyword search may be underinclusive, when we provide you with the remaining materials, we will designate all sensitive personal information that may remain, including personal financial, family, and health information, as confidential pursuant to the parties' forthcoming protective order.

Third, with respect to documents that were identified by the keyword search, we will provide Ms. Lizon with the option of having them returned to her. Again, we would not look at any document received in response to the subpoena to Ms. Lizon unless we are also providing that document to the other parties who have requested copies of the materials.

If this approach sounds acceptable to you, we can obtain a cost estimate. Please let us know if you would like to discuss this further.

Best,
Elisabeth

Elisabeth S. Theodore

Partner

Arnold & Porter

601 Massachusetts Ave., NW

Washington | District of Columbia 20001-3743

T: +1 202.942.5891

Elisabeth.Theodore@arnoldporter.com | www.arnoldporter.com

From: Jones, Stanton

Sent: Tuesday, March 26, 2019 2:57 PM

To: Strach, Phillip J.

Cc: Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; John Branch; dworrell@shanahanmcdougal.com; Nate Pencook; Cox, Paul; Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Theodore, Elisabeth; Jacobson, Daniel; Gersch, David P.

Subject: Re: Common Cause v. Lewis -- notice of subpoena compliance

Phil:

We received the electronic media on Wednesday, March 13, and provided them to the vendor the same day.

The vendor is Stroz Friedberg.

I'm not aware of any obligation to consult you on which vendor we'd use to process materials we received in response to our subpoena. We aren't asking legislative defendants to share the cost of processing the materials, only the cost of providing a copy to you, per Rule 45. Certainly let me know if you have a different understanding.

The vendor is still processing the materials.

We are inquiring with the vendor about the cost, logistics, and timing of providing you a copy. Same for the state defendants who also have requested a copy. We will let you know as soon as we have this information.

Regards,
Stanton

Sent from my iPhone

On Mar 26, 2019, at 10:11 AM, Strach, Phillip J. <phil.strach@ogletree.com> wrote:

Stanton: Thanks. Please let us know the date the media was received by plaintiffs, when plaintiffs sent them off to be processed, and which entity is being used to process the media. I note for now that we were not asked for our input on which entity to use or provided any information about possible costs prior to sending the data to be processed. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>
Sent: Tuesday, March 26, 2019 10:02 AM
To: Strach, Phillip J. <Phil.Strach@ogletreedekins.com>; Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedekins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencook <NPencook@shanahanmcdougal.com>; Cox, Paul <pcox@ncdoj.gov>
Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Phil, the items we received were all electronic media, namely four external hard drives and 18 thumb drives. We are having them processed and will let you know when we have them in a form that can be shared, as well as the cost of sharing under Rule 45.

Regards,
Stanton

From: Strach, Phillip J. [<mailto:phil.strach@ogletree.com>]
Sent: Tuesday, March 26, 2019 9:54 AM
To: Jones, Stanton; Brennan, Stephanie; McKnight, Michael D.; Braden, E. Mark; Raile, Richard; Majmundar, Amar; Riggins, Alyssa; Stanley, Trevor M.; John Branch; dworrell@shanahanmcdougal.com; Nate Pencoock; Cox, Paul
Cc: Eddie Speas; Mackie, Caroline P.; zzz.External.AKhanna@perkinscoie.com; melias@perkinscoie.com; Theodore, Elisabeth; Jacobson, Daniel; Gersch, David P.
Subject: RE: Common Cause v. Lewis -- notice of subpoena compliance

Stanton:

Thanks for this notice. Please send us a copy of the materials received today.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412
phil.strach@ogletree.com | www.ogletree.com | [Bio](#)

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>
Sent: Wednesday, March 20, 2019 9:12 PM
To: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Strach, Phillip J. <Phil.Strach@ogletreedekins.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedekins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; John Branch <JBranch@shanahanmcdougal.com>; dworrell@shanahanmcdougal.com; Nate Pencoock <NPencoock@shanahanmcdougal.com>; Cox, Paul <pcox@ncdoj.gov>
Cc: Eddie Speas <espeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>; AKhanna@perkinscoie.com; melias@perkinscoie.com; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Gersch, David P. <David.Gersch@arnoldporter.com>
Subject: Common Cause v. Lewis -- notice of subpoena compliance

Counsel:

Pursuant to N.C. R. Civ. P. 45, I write to give notice that we recently received materials in compliance with our February 13 subpoena to Stephanie Hofeller Lizon.

Regards,
Stanton

R. Stanton Jones
Arnold & Porter
601 Massachusetts Ave., NW | Washington | DC 20001-3743
T: +1 202.942.5563 | F: +1 202.942.5999
stanton.jones@arnoldporter.com | www.arnoldporter.com

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EXHIBIT 17

From: Jones, Stanton
Sent: Thursday, April 18, 2019 4:53 PM
To: Strach, Phillip J.; John Branch; Cox, Paul
Cc: Brennan, Stephanie; McKnight, Michael D.; Majmundar, Amar; zzz.External.AKhanna@perkinscoie.com; Braden, E. Mark; Nate Pencook; Riggins, Alyssa; Stanley, Trevor M.; Raile, Richard; melias@perkinscoie.com; Hill, Linda; Theodore, Elisabeth; Jacobson, Daniel; Speas, Edwin M.; Mackie, Caroline P.; Christine McCaffrey
Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Phil, John, and Paul:

I'm writing to follow up on our earlier email exchange regarding the materials we received in response to our subpoena to Stephanie Hofeller. As you know, our motion for clarification regarding potential filtering of personal sensitive information is pending with the Court. In the meantime, we want to again give you the opportunity to receive the materials that we do not propose to filter, as there is no dispute regarding those materials.

Here is what we propose: We will have Stroz go ahead and filter the personal sensitive materials as proposed in our motion for clarification, namely by removing the 1,001 files identified in the spreadsheet I previously sent you. Then, either (1) Stroz can make and mail you a copy of the post-filtering materials, or (2) you can send someone to Stroz's office in DC to create your own copy onsite there. If you prefer the former (i.e., having Stroz create and mail you a copy, and the Court later approves the proposed filtering process, you will pay the cost only of creating the copy and mailing it to you (for which we previously sent you an estimate), not any cost associated with the filtering itself. If the Court later disapproves the proposed filtering process, you will not be responsible for any costs associated with this interim process.

Let us know how you'd like to proceed.

Stanton

Stanton Jones

Partner

Arnold & Porter

601 Massachusetts Ave., NW

Washington | District of Columbia 20001-3743

T: +1 202.942.5563

Stanton.Jones@arnoldporter.com | www.arnoldporter.com

From: Jones, Stanton <Stanton.Jones@arnoldporter.com>

Sent: Friday, April 12, 2019 11:50 AM

To: Strach, Phillip J. <phil.strach@ogletree.com>; John Branch <JBranch@shanahanlawgroup.com>

Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Cox, Paul <pcox@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; melias@perkinscoie.com; Hill, Linda <LHill@poynerspruill.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Speas, Edwin M. <ESpeas@poynerspruill.com>; Mackie, Caroline P.

<CMackie@poynerspruill.com>; Christine McCaffrey <CMcCaffrey@shanahanlawgroup.com>

Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Phil:

These are the search terms we used to generate the list of file names and file paths we sent you yesterday:

Lizon!
Tax!
(401-K)!
Steph!
Kath!
Medic!
Prescription!
Doctor!
Surgery!
Glucose!
Cancer!
Blood!
Trust!
W-9!
Guardian!
Patient!
Hospital!
Mojko!
Mojmir!
HIPA!
Police!
Vaccination!
Wife!
Parent!
Passport!
Bank!
Daughter!
Investment!

Following your latest e-mail below, we have added the terms "IRA," "IRS," variations of "401-k" based on removing the hyphen and making the k capitalized or not, and "Hartsbough." This search produced 32 additional files that we propose to filter out. Attached is an updated spreadsheet with the complete list of files we propose to filter, with the 32 new ones added at the end. If you have other terms indicative of sensitive personal information that you think we should search, please let us know. As we've said previously, our only objective here is to remove sensitive personal information so that no one sees it, including us. And we realize that the keyword search process may be underinclusive, which is why we would designate any sensitive personal information that is not picked up by the keyword searches as Highly Confidential under the Consent Protective Order.

Beyond that, your characterization that the external electronic media included files that are "nonresponsive" to the subpoena, including about Dr. Hofeller's work in other states, is irrelevant and wrong. As Intervenor Defendants noted yesterday in their brief, all of the external electronic media we received are responsive to our subpoena, which requested "storage devices" containing relevant ESI. Neither the subpoena recipient nor any party lodged any objection to any aspect of the subpoena.

Regards,
Stanton

From: Strach, Phillip J. [<mailto:phil.strach@ogletree.com>]

Sent: Friday, April 12, 2019 10:55 AM

To: Jacobson, Daniel; Jones, Stanton; John Branch

Cc: Brennan, Stephanie; McKnight, Michael D.; Majmundar, Amar; zzz.External.AKhanna@perkinscoie.com; Braden, E. Mark; Nate Pencook; Cox, Paul; Riggins, Alyssa; Stanley, Trevor M.; Raile, Richard; melias@perkinscoie.com; Hill, Linda; Theodore, Elisabeth; Speas, Edwin M.; Mackie, Caroline P.; Christine McCaffrey

Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Dan:

We are not sure how the filtering was done but it appears to have removed only 1.2% of the documents from the index, a far lower amount of personal files than Plaintiffs have led us to believe exist in the data Ms. Lizon produced. Personal information clearly remains on the index. For instance, the very last line in the Index is a document called “\$loans to Chris Hartsough” and it is not marked on the files to filter. However, other pictures/documents involving Chris Hartsough were filtered out. We did another quick search for terms that would include sensitive information like “401k” or “IRA” and came up with many documents not included in the filtered list. Just two examples are document 23269 (“401K Deposit Wire 3-31-2014”) and 23262 (“SEP IRA plus 401k RMD Worksheet”). This does not even begin to cover the many files on the index that are clearly nonresponsive to Plaintiffs’ subpoena, such as files dealing with issues in other states. A filtering approach is clearly not going to be sufficient to remove personal and nonresponsive files to protect Dr. Hofeller’s privacy, which is why we have proposed approaches that are designed to ensure all such files are removed and returned or destroyed.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>

Sent: Thursday, April 11, 2019 10:01 PM

To: Jones, Stanton <Stanton.Jones@arnoldporter.com>; Strach, Phillip J. <Phil.Strach@ogletreedekins.com>; John Branch <JBranch@shanahanlawgroup.com>

Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedekins.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; AKhanna@perkinscoie.com; Braden, E. Mark <MBraden@bakerlaw.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Cox, Paul <pcox@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedekins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>; melias@perkinscoie.com; Hill, Linda <LHill@poynerspruill.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Speas, Edwin M. <ESpeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>

Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Phil and John,

Following up on Stanton’s email below, to make things as easy as possible, we went ahead and created the list of file names / file paths that our vendor would filter out. That list is attached (Plaintiffs designate this list as Highly Confidential pursuant to the protective order). Please let us know by 12PM tomorrow (Friday) if you agree to our proposal below, based on the attached list of files names / paths.

Best,

Dan

Daniel Jacobson
Senior Associate

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From: Jones, Stanton <Stanton.Jones@arnoldporter.com>

Sent: Thursday, April 11, 2019 6:13 PM

To: Strach, Phillip J. <phil.strach@ogletree.com>; John Branch <JBranch@shanahanlawgroup.com>

Cc: Brennan, Stephanie <Sbrennan@ncdoj.gov>; McKnight, Michael D. <Michael.McKnight@ogletreedeakins.com>; Majmundar, Amar <amajmundar@ncdoj.gov>; zzz.External.AKhanna@perkinscoie.com <AKhanna@perkinscoie.com>; Braden, E. Mark <MBraden@bakerlaw.com>; Nate Pencook <NPencook@shanahanlawgroup.com>; Cox, Paul <pcox@ncdoj.gov>; Riggins, Alyssa <Alyssa.Riggins@ogletreedeakins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Raile, Richard <rRaile@bakerlaw.com>; melias@perkinscoie.com; Hill, Linda <LHill@poynerspruill.com>; Jacobson, Daniel <Daniel.Jacobson@arnoldporter.com>; Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Speas, Edwin M. <ESpeas@poynerspruill.com>; Mackie, Caroline P. <CMackie@poynerspruill.com>

Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Phil and John:

I'm taking off Ms. Myers and Mr. Steele. Per the third approach to the sensitive subpoena materials proposed by Legislative Defendants, would Legislative Defendants and Intervenor Defendants agree to the following procedures: We will send you a list of all the file names and file paths we propose to filter out on the basis of confidentiality concerns, along with a list of the search terms used to generate that list. If you believe any of the files on the list should not be filtered and should instead be provided to you, you can tell us and we can confer and seek the court's intervention only as needed with respect to specific documents. We doubt there will be any disagreement given the nature of the file names and file paths that will be filtered, e.g., documents named "tax return" or "medications."

If you both agree to this approach, we will create and send you the list and the search terms, and we can all jointly advise the Court that we've resolved this dispute consensually.

Please let us know by 12pm ET tomorrow whether you agree.

Regards,
Stanton

From: Strach, Phillip J. [<mailto:phil.strach@ogletree.com>]

Sent: Thursday, April 11, 2019 5:17 PM

To: Nate Pencook; Cox, Paul; Riggins, Alyssa; Jacobson, Daniel; Mackie, Caroline P.; Stanley, Trevor M.; Myers, Kellie Z.; Steele, Adam H.

Cc: Jones, Stanton; Theodore, Elisabeth; Brennan, Stephanie; McKnight, Michael D.; Majmundar, Amar; Speas, Edwin M.; zzz.External.AKhanna@perkinscoie.com; Braden, E. Mark; Raile, Richard; melias@perkinscoie.com; Hill, Linda; John Branch

Subject: RE: Common Cause v. Lewis, 18 CVS 14001 -- Plaintiffs' Motion for Clarification Pursuant to Rule 45

Ms. Myers and Mr. Steele:

Attached is Legislative Defendants' Response to Plaintiffs' Motion for Clarification.

EXHIBIT 18

1 minute to page through it. My question is just
2 going to be do you recognize this as a copy of
3 your first report in this case dated April 30,
4 2019.

5 A. Yes.

6 Q. And if you take a look at Exhibit 2, do you
7 recognize that document as your supplemental
8 report in this case dated May 7th, about a week
9 later?

10 A. Yes.

11 Q. Do these two reports contain all of the opinions
12 you intend to express at trial in this case?

13 MR. FARR: Objection.

14 THE WITNESS: At this time.

15 BY MR. JONES:

16 Q. Do these two reports contain all the analysis
17 that you intend to present at trial?

18 A. Again, as it stands at this time, yes. The only
19 reason I say that is we just got all these
20 rebuttal reports and I don't know if I'll be
21 asked to do anything out of those.

22 Q. Have you been asked to do any analysis -- any
23 further analysis responsive to what is in the
24 plaintiffs' rebuttal expert reports?

25 A. No, I haven't had a chance to look at them in

1 enough detail for that yet.

2 Q. Other than what's in the two reports, Exhibit 1
3 and 2, have you done any other analysis that you
4 intend to present at trial in this case?

5 A. No.

6 Q. Other than what's reflected in those two
7 reports, have you reached any other opinions or
8 conclusions that you intend to express at trial
9 in this case?

10 A. No. Again, others might come up, but, no, not
11 at this time.

12 Q. Do you have any plans sitting here today to do
13 any additional analysis for presenting at trial
14 in this case?

15 A. Not as I sit here today. There may be things
16 again that come up out of the recent reports.

17 Q. And I asked I think part of this question
18 earlier, but I'll ask it more broadly.

19 Sitting here today, have you been asked
20 to do any additional analysis for purposes of
21 presentation at trial that's not reflected in
22 your two reports that are Exhibits 1 and 2?

23 MR. FARR: I'll object to that and
24 instruct him not to answer on the grounds of
25 attorney-client privilege and work product.

1 BY MR. JONES:

2 Q. Are you going to follow your counsel's
3 instruction not to answer?

4 A. Yes.

5 Q. Did anyone else at -- anyone at NDC or elsewhere
6 assist you in preparing these reports?

7 A. No. I got data from the state, from the legal
8 team, but this is all my work. No one else at
9 NDC worked on it.

10 Q. If you flip to page 4 of your April 30th report,
11 which is Exhibit 1, under the heading Task
12 Description, you identify three issues that you
13 address in the report, correct?

14 A. Yes.

15 Q. And the first issue you were asked to address
16 was to review the 2017 legislative district maps
17 and whether they maximize Republican political
18 power in the legislature, right?

19 A. Yes.

20 Q. Okay. And for that issue you conclude that the
21 2017 adopted maps do not maximize Republican
22 political power because without the county
23 groupings rule and other traditional districting
24 criteria you believe that you can draw an even
25 more pro-Republican map, right?

EXHIBIT 19

1 (WHEREUPON, Chen Exhibit 13 was marked
 2 for identification.)
 3 BY MR. FARR:
 4 Q. Dr. Chen, the court reporter has handed you an
 5 exhibit marked Exhibit 13. Can you tell us what
 6 this is.
 7 A. This is my response report from last week.
 8 Q. Why did you call it a response report?
 9 A. I was responding to expert witness reports that
 10 have been written by some other experts.
 11 MR. FARR: Just for the record, the
 12 position of the legislative defendants is that
 13 this is neither a response report nor a rebuttal
 14 report but a new report on entirely new
 15 information.
 16 BY MR. FARR:
 17 Q. So, Dr. Chen, does it appear to say in this
 18 response report you analyzed Dr. Tom Hofeller's
 19 personal computer data to form opinions about
 20 when Dr. Hofeller created drafts of the 2007
 21 plans and what data he considered when doing so
 22 and what his goals were? Is that a fair
 23 statement?
 24 MR. JACOBSON: I think you said 2007
 25 plans.

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1 my report which is page 2, the first full
 2 paragraph, and this is the best of my
 3 information. This is all the information I have
 4 about the files that I received, at least with
 5 respect to their providence. So I said -- I
 6 wrote here:
 7 "...which I understand
 8 Plaintiffs' counsel received through
 9 a subpoena to Dr. Hofeller's daughter.
 10 I received the files containing
 11 Dr. Hofeller's draft maps directly
 12 from Plaintiffs' forensic vendor,
 13 Stroz Friedberg. "
 14 So I understand they're backups. You
 15 added the word personal, and that's not within
 16 my information. You may well be right, but it's
 17 not within my information to either affirm or
 18 deny.
 19 Q. What's your source for the information you're
 20 aware of for what you received? Is it the
 21 attorneys in the case or anyone else?
 22 A. Well, from plaintiffs' counsel. The sentence
 23 that I just read to you, that second
 24 paragraph -- that first full paragraph from
 25 page 2, the source of that information, as I

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1 BY MR. FARR:
 2 Q. 2017.
 3 A. I'm going to ask the court reporter to repeat --
 4 just repeat all of that, please. I'm going to
 5 ask you to repeat it again, but would it be all
 6 right if I had a pen and paper in front of me
 7 just to take some notes.
 8 (Record Read.)
 9 THE WITNESS: I'm just going to ask the
 10 court reporter to please read it very slowly.
 11 MR. FARR: Let me do it over and break
 12 the question down, make it easier for you.
 13 BY MR. FARR:
 14 Q. In your rebuttal report, is it fair to say that
 15 you analyzed Dr. Hofeller's personal computer
 16 data?
 17 A. It's my understanding that the files that I
 18 received were copies of files from
 19 Dr. Hofeller's backup of a hard drive. I
 20 describe it in more precise detail in my report
 21 so I just prefer to refer to that.
 22 Q. Those were his personal hard drives?
 23 A. You -- you added the word personal and I'm not
 24 sure that that's a part of my information. So
 25 I'm just going to refer to you what I wrote in

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1 wrote down in that paragraph, is, of course,
 2 from plaintiffs' counsel.
 3 Q. Okay. Did you use this information to form
 4 opinions about when Dr. Hofeller created drafts
 5 of the 2017 plans?
 6 A. Yeah, I formed the opinion which I think is
 7 basically what you're saying. I formed the
 8 opinion that, quote, Dr. Hofeller had already
 9 completed drafting the vast majority of House
 10 Bill 927, Senate Bill 691 plans by late
 11 June 2014, and that was obviously based on these
 12 draft plans that I received.
 13 Q. Did you mean June 20, 2017?
 14 MR. JACOBSON: You said 2014.
 15 THE WITNESS: I'm sorry. Obviously I
 16 meant June 2017.
 17 BY MR. FARR:
 18 Q. And did you use the information to form opinions
 19 about the data he considered, Dr. Hofeller?
 20 A. I formed opinions about the data that
 21 Dr. Hofeller possessed, possessed in these
 22 Maptitude files or Maptitude folders.
 23 Q. Okay. So you don't know whether he considered
 24 the data or not. You just know it was in his
 25 folders?

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1 MR. JACOBSON: Object to form.
 2 THE WITNESS: Yeah, if you want to
 3 point to specific data that you want me to
 4 answer that question I'll be able to answer it
 5 more clearly. It's just a little bit general
 6 and vague and I'm not sure I can really wrap my
 7 head around.
 8 BY MR. FARR:
 9 Q. All right. Dr. Chen, do you have a background
 10 in computer forensics?
 11 A. No.
 12 Q. Do you have any professional certification in
 13 the field of computer forensics?
 14 A. No.
 15 Q. Have you ever been retained to perform a
 16 forensic analysis of computer data?
 17 A. Could you just repeat.
 18 Q. Have you ever been retained to perform a
 19 forensic analysis of computer data?
 20 A. No.
 21 Q. Okay. You just mentioned this about page 2 on
 22 your rebuttal report about the information was
 23 obtained through a subpoena to Dr. Hofeller's
 24 daughter.
 25 A. Yes.

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1 counsel received the devices?
 2 A. Plaintiffs' counsel didn't tell me, but I can
 3 logically gather that it was before the time
 4 that I received copies of files from that --
 5 from that subpoena or from those hard drives.
 6 Q. That would make sense.
 7 Do you know when you received the
 8 devices or the data?
 9 A. I did not receive any devices. I did receive
 10 files, and I can give you a general range. So
 11 sometime in early May I started receiving files
 12 from -- from -- I forget the names -- Stroz
 13 Friedberg, and then there were a couple of
 14 different deliveries of files. And I recall --
 15 the latest one, I can't specifically recall if
 16 it was in late May or early June, somewhere in
 17 that time period.
 18 Q. Did you ever personally -- I don't know what the
 19 right word is, Dr. Chen, I'll say download files
 20 yourself from Hofeller's devices, from
 21 Dr. Hofeller's devices?
 22 A. No, I don't know what these devices or hard
 23 drives look like. I've had no physical access
 24 to them. I would have no ability to myself go
 25 and access them or download any files from them.

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1 Q. What other facts were you provided regarding the
 2 receipt of the data?
 3 A. I think I just about listed it out here in this
 4 paragraph. I was told that there was a
 5 subpoena, and I was told that Dr. Hofeller's
 6 daughter turned over hard drives in response to
 7 that subpoena. That's about all the information
 8 I have here.
 9 Q. Do you know whether the data was recovered off a
 10 computer, a USB storage device, a portable hard
 11 drive or some other medium?
 12 A. I gather that those are specific forms of what
 13 hard drive can represent and I don't know the
 14 specific form. I don't know the model. I don't
 15 know the type of hard drive, and I think that's
 16 what -- those are different things you're
 17 listing there.
 18 Q. Do you know when -- do you know who received
 19 Dr. Hofeller's devices?
 20 A. Well, I know that plaintiffs' counsel received
 21 the hard drives and the files through a
 22 subpoena, so I know that generally. If you're
 23 asking me physically, I'm not sure I can give
 24 you a more precise answer than that.
 25 Q. That's good. Do you know when the plaintiffs'

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1 Q. So the files you received were from this
 2 plaintiffs' vendor named Stroz Friedberg?
 3 A. Stroz Friedberg, yes, sir.
 4 Q. So they're the ones -- so who decided what files
 5 you were going to receive? Do you know?
 6 A. Well, I'm happy to answer that question with
 7 respect to specific files, and so I'm prepared
 8 to go through and talk about those with you if
 9 you'd like, but you're just going to have to ask
 10 me about specific files. And it would be more
 11 useful to talk about that in specific sections
 12 in my response report if you want to go that
 13 way.
 14 Q. Did you receive data from anyone other than
 15 Stroz Friedberg?
 16 A. Well, you're going to have to limit -- you know,
 17 you're going to have to explain what data you're
 18 talking about. Obviously I have before received
 19 data from people other than Stroz Friedberg and
 20 for my original expert report obviously, but --
 21 Q. I'm sorry.
 22 A. -- I think you're trying to limit the question
 23 to a certain class of data.
 24 Q. I'm sorry. It was my mistake.
 25 Did you receive data from

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1 Dr. Hofeller's devices from anyone other than
 2 Stroz Friedberg?
 3 MR. JACOBSON: Objection. To the
 4 extent you're asking about attorney-client
 5 communications beyond facts, data or assumptions
 6 that are relied upon or in the report, I'm going
 7 to instruct Dr. Chen not to answer.
 8 THE WITNESS: So what I'm going to
 9 do -- can I start answering.
 10 BY MR. FARR:
 11 Q. Yes, sure.
 12 A. So I'm going to follow Mr. Jacobson's
 13 instruction, and so within those confines I'm
 14 going to answer your question.
 15 And my answer is that the files that
 16 originated from Dr. Hofeller's backups or hard
 17 drives that I relied upon in my report I
 18 received directly from the forensic vendor, from
 19 Stroz Friedberg.
 20 Q. Did you ask --
 21 A. Actually, I want to just go back and make sure
 22 I've thought about and responded to your
 23 question exactly as possible. And could I just
 24 ask the court reporter to read back me the
 25 question that I just gave a response to and I

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1 will think about if I need to add anything. Is
 2 that all right? Is that all right, Mr. Farr?
 3 Q. Oh, sure.
 4 A. I'm going to ask the court reporter to repeat
 5 the question and I'm going to think about if I
 6 need to add anything.
 7 (Record Read.)
 8 THE WITNESS: Okay. I think the
 9 literal answer to your question is, no, I did
 10 not receive any files that were copies of files
 11 from Dr. Hofeller's backups or hard drives that
 12 I relied upon in my report from anybody other
 13 than Stroz Friedberg.
 14 I just want to add to that, even though
 15 I don't think this technically falls within what
 16 your question is asking. I do explain how there
 17 were various screenshots and various shape files
 18 that I analyzed. These were not screenshots or
 19 shape files that were copies of files from
 20 Dr. Hofeller's hard drives but instead were
 21 created by Mr. Esselstyn by opening up files
 22 that were on -- were on Dr. Hofeller's backup
 23 files.
 24 So I don't think that really falls
 25 within the question that you were asking, but I

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1 just wanted to be as completely -- as complete
 2 as possible.
 3 BY MR. FARR:
 4 Q. Did you ask for the data you received, or did
 5 you simply receive data which you were then
 6 asked to opine on?
 7 A. In some cases former, in some cases the latter,
 8 and I'm prepared to go through individual files
 9 and tell you about them, but that's the general
 10 answer.
 11 Q. Okay. I hope I'm going to ask this the right
 12 way. Do you own a Maptitude license?
 13 A. I personally right now do not have an active
 14 Maptitude license.
 15 Q. So in doing this report, did you use a Maptitude
 16 program yourself?
 17 A. So I don't have -- I don't personally, on my own
 18 personal computer, have a Maptitude license so
 19 what instead happened is that when I wanted to
 20 look at a Maptitude folder, I looked at
 21 Mr. Esselstyn's computer. And Mr. Esselstyn, on
 22 his computer, does in fact have an active,
 23 updated, whatever you want to call it, latest
 24 Maptitude license.
 25 Q. Mr. --

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1 A. Mr. Esselstyn. I'll just tell you where
 2 that -- this is first mentioned. If you'll look
 3 at the bottom of page 2 of my report, I think
 4 this is the first time that I mention
 5 Mr. Esselstyn. So he is plaintiffs' consulting
 6 expert.
 7 Q. Who does he work for? Does he have his -- does
 8 he work for the same company, the Stroz
 9 Friedberg?
 10 A. No. Mr. Esselstyn has nothing to do with Stroz
 11 Friedberg. Mr. Esselstyn, I believe to the best
 12 of my knowledge, he's self-employed, he runs his
 13 own consulting firm. He does a lot of stuff
 14 that has nothing to do with redistricting. I
 15 think he's an urban planner or city planner,
 16 something like that, architecture, something
 17 along those lines. I'm not remembering it quite
 18 correctly, but I sort of have that recollection
 19 of something that's unrelated to redistricting.
 20 Q. And where does he reside?
 21 A. Oh, he resides I believe in Asheville, if I'm
 22 remembering correctly.
 23 Q. When you were consulting with him, were you in
 24 person or --
 25 A. I wasn't physically -- I'm sorry, I didn't mean

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1 to cut you off.
 2 Q. That's all right.
 3 A. I wasn't physically in Asheville. At all times
 4 that I needed to look at a Maptitude -- a
 5 computer with Maptitude and open up a Maptitude
 6 folder, a Maptitude backup, I would get on
 7 to -- it's just a program called Google
 8 Hangouts, but basically I would look at
 9 Mr. Esselstyn's computer screen, and I would
 10 tell him open this file, scroll over here, click
 11 on that, things of that nature. So basically he
 12 would be on his computer, I would remotely be
 13 looking at the same computer, and then telling
 14 him open this file, look over there, things
 15 along those lines.
 16 Q. Have you ever personally used Maptitude?
 17 A. I have.
 18 Q. Have you drawn maps with Maptitude?
 19 A. I may have tried to edit a districting plan or
 20 some other kind of map. Maptitude does a lot of
 21 things outside of redistricting. It's a GIS
 22 program basically, so I might have edited some
 23 shape files, something along those lines.
 24 So in the past I've had Maptitude on my
 25 computer before. I don't any more. I don't

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1 have the current or updated license or latest
 2 version.
 3 Q. When is the last time you had a Maptitude
 4 license on your computer?
 5 A. I don't exactly remember. It would have been
 6 more than a few years ago.
 7 Q. Did you receive any Hofeller files that had --
 8 Dr. Hofeller files that had a label saying that
 9 they were privileged or confidential or attorney
 10 work product?
 11 A. I don't recall seeing that.
 12 Q. Have you ever worked with Stroz Friedberg
 13 before?
 14 A. I had no idea who they were until recently.
 15 Q. Did you get all the documents from
 16 Dr. Hofeller's daughter or just a subset?
 17 MR. JACOBSON: Do you want to reframe
 18 the question. It was confusing. Or if not,
 19 it's up to you. I was confused by it.
 20 BY MR. FARR:
 21 Q. Did you get everything that was produced by
 22 Dr. Hofeller's daughter or just a subset?
 23 A. I don't have a basis to know the answer to that
 24 just logically thinking about it. If I received
 25 a certain set of files, how would I know if --

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1 logically how would I know if this is all the
 2 files or just a subset of them.
 3 MR. JACOBSON: Tom, if I could just
 4 jump in and clarify. It's a subset. He doesn't
 5 know what he doesn't know.
 6 MR. FARR: Okay. That's fine.
 7 BY MR. FARR:
 8 Q. Who decided what information you received? Was
 9 that your decision or was it someone else's
 10 decision?
 11 A. So like I said, you've asked me this question
 12 generally and I've told you I'm happy to go file
 13 by file or section by section and I'll answer
 14 that question specifically, and I'm prepared to
 15 give you the best of my recollection for all
 16 these files here. You asked me that question
 17 earlier and I said sometimes it's the former and
 18 sometimes it's the latter. So I'm happy to go
 19 file by file and help you to understand my
 20 recollection.
 21 Q. Can you just go through your report right now
 22 and tell me?
 23 A. That's what I was just suggesting.
 24 Q. Why don't you just do that.
 25 A. Okay. Sure. You want me to just kind of walk

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1 through the different sections and then I'll
 2 tell you for each section's files --
 3 Q. Right.
 4 A. -- how those files came to be in my possession.
 5 Q. Right.
 6 A. Sure. Okay. So the first section that we'll
 7 start with -- and this is not the level of
 8 detail or if I'm going in a different direction,
 9 you should feel free to cut me off and redirect
 10 me. I think I know what you're trying to ask
 11 and I'm going to tell you everything that I
 12 remember here.
 13 So the first section here is a section
 14 which I am comparing two draft Maptitude
 15 folders, Maptitude backup folders that came from
 16 Dr. Hofeller's hard drive. And this first
 17 section goes through I believe it is page 38 of
 18 my report where I'm looking at these two draft
 19 maps. And one of them I start talking about on
 20 page 3. It's in a folder named, quote, NC House
 21 J-25003.bak.zip. And ".bak" just means this was
 22 a backup file, it was a zipped backup file.
 23 So that one, as well as the next draft
 24 Maptitude folder that I analyzed, which is the
 25 Senate map called NC Senate J-24001 .bak.zip,

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1 these were ones that were last modified in June
 2 of 2017, and these -- Mr. Jacobson selected
 3 these to direct my attention towards.
 4 So I did not obviously know of the
 5 existence. I didn't ask for them by name.
 6 Plaintiffs' counsel made the decision to convey
 7 those files to me, and they were -- they were
 8 transmitted or delivered to me through Stroz
 9 Friedberg.
 10 Q. So that's the House and the Senate plan?
 11 A. Correct, these first two House and Senate plans.
 12 Q. Okay.
 13 A. So that's the first section of my report. And
 14 then now we can move to the next section that
 15 starts on page 39 which -- in which I start
 16 discussing racial data.
 17 And in this section I discuss I believe
 18 it's six different Maptitude folders, backup
 19 folders, so six different backups of those draft
 20 plans. And before I tell you about them, I'm
 21 going to try to point you to the list of them so
 22 that we can know what I'm talking about.
 23 The first one of these six I think is
 24 listed at the bottom of page -- and I'm going to
 25 group these six together because I'm going to

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1 give you a unified answer about all six of
 2 these.
 3 So if you look at the bottom of
 4 page 39, I think I mentioned the first of these
 5 six, a draft plan titled, quote, NC House
 6 J-25003.bak.zip which was last modified and
 7 backed up on August 14, 2017. That's the first
 8 of the six. I'm going to list out all six of
 9 them before I tell you how I got them.
 10 Q. Can I stop you for a second.
 11 How did you know when it was last
 12 backed up? Is that something you determined or
 13 did someone else determine that?
 14 A. Oh, okay. Yeah, good question. I determined
 15 that, and the way that that was determined is
 16 that I looked at the metadata of the file. So
 17 if you have these files on a folder in Windows
 18 you can look at the metadata and you can see the
 19 last modified date of the file. So everywhere
 20 I'm talking about, last modified date in my
 21 report for these various files, that's the basis
 22 of me determining those last modified dates.
 23 So that was the first of the six. And
 24 I'm just going to go through this list of six
 25 before I tell you how I came to have these

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1 files.
 2 Q. Okay.
 3 A. The next one is going to be several pages later
 4 and it appears on the last paragraph on page 45.
 5 This is a Maptitude backup -- plan backup
 6 called, quote, NC Senate J-23005.bak.zip, last
 7 modified on August 13th. And just to make sure
 8 I list them all completely, I'm going to -- and
 9 I'm happy to give this to you after I finish,
 10 but I'm going to keep a running list here of the
 11 files that I've mentioned just to make sure I've
 12 got everything straight as I'm telling you about
 13 them. So if you'll just bear with me and give
 14 me a moment.
 15 So I've listed two of the six this I
 16 was going to mention. And then the remaining
 17 four are listed in the first paragraph on
 18 page 47. So you'll see a list there of four
 19 files. I won't read them out, but I'm going to
 20 write them down here on my -- on this piece of
 21 paper, so just give me a second
 22 Q. Can we make that as an exhibit?
 23 A. Sure. I'm going to five this to you after I'm
 24 finished.
 25 Q. We'll give this to the court reporter.

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1 A. All I'm doing is writing down the Maptitude file
 2 names that I'm reading out and I'm writing the
 3 last modified date exactly as I reported it in
 4 my response report. So there's no new
 5 information here. I'm just copying six file
 6 names. And I'm happy to give this to you after
 7 I'm done. And again, I'm just copying this list
 8 of four files from page 47 right now.
 9 So I've written down these six files
 10 that I -- these six Maptitude folders that I
 11 analyzed in this particular section, and I've
 12 written down these folder names, and so I'm just
 13 going to give you a general response with
 14 respect to these six Maptitude folders.
 15 Q. Can we mark that as an exhibit?
 16 A. Yes.
 17 (WHEREUPON, Chen Exhibit 14 was marked
 18 for identification.)
 19 THE WITNESS: So these were six
 20 different Maptitude backup folders that I viewed
 21 on Mr. Esselstyn's computer, on his Maptitude or
 22 on his Maptitude program, and I requested
 23 Mr. Esselstyn to open them up, and I looked at
 24 these folders with -- with Mr. Esselstyn on his
 25 computer and then, obviously, as I describe in

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1 the report, I took various screenshots of -- or
 2 I -- actually I instructed Mr. Esselstyn to
 3 create screenshots of what was on his screen and
 4 then send me those screenshots, but he did so at
 5 my direction.
 6 BY MR. FARR:
 7 Q. Could you point those out in my report?
 8 A. Sure. There's screenshots all over in this
 9 section, but they start on page 41 which is
 10 labeled as Figure 25, and they go through
 11 Figure 29 which is on page 46. I think that's
 12 the last one. Let me just check. Yes, that's
 13 the last one.
 14 So these screenshots came from that set
 15 of six Maptitude folders. And again, these were
 16 opened up because I instructed Mr. Esselstyn to
 17 do so.
 18 Q. So these are screenshots that Mr. Esselstyn
 19 called up?
 20 A. No. No. So a screenshot is something that you
 21 take. A folder -- a file is something that you
 22 call up.
 23 So I instructed Mr. Esselstyn to open
 24 up these Maptitude folders, and then after
 25 opening them up I then instructed him to take

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1 various screenshots of what he and I were seeing
 2 on his computer and then send me those
 3 screenshots.
 4 Q. So let me ask you a question.
 5 Do you have any evidence that
 6 Dr. Hofeller was viewing the screenshots that
 7 you had Mr. Esselstyn -- am I saying that right?
 8 A. Esselstyn.
 9 Q. Do you have any evidence that Dr. Hofeller
 10 was -- viewed these screenshots while he was
 11 drawing the districts?
 12 A. Yeah. And I'll just give you an example. So
 13 when you see in one of these Maptitude folders
 14 that there's, say, a formula field or that the
 15 district has been sorted in a particular field
 16 by, say, racial composition -- these are two
 17 things that I talk about in more detail in my
 18 report -- these are things that are not
 19 automatic settings. Somebody would have had to
 20 go in and create these specific formula fields.
 21 Somebody would have had to go in and
 22 specifically align the districts by African
 23 American voting age population. Those things
 24 don't happen automatically in Maptitude.
 25 So with that information with my

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1 knowledge of just generally how GIS software
 2 works and knowing that these folders came from
 3 Dr. Hofeller's hard drive, it's just a matter of
 4 putting two and two together to infer that
 5 Dr. Hofeller was creating the formula field that
 6 I take a screenshot on in Figure 27, for
 7 example, were aligning the districts according
 8 to African American voting age population, as I
 9 talk about it in length in that section of the
 10 report.
 11 Q. I've got a question for you.
 12 When you -- when you did your simulated
 13 maps, did you base your simulated maps on
 14 partisan intent when you were drawing them?
 15 A. My simulated maps were ignoring partisan data.
 16 Q. When you drew them.
 17 A. I didn't draw any maps. I programmed the
 18 computer.
 19 Q. I'm sorry, Dr. Chen. You're too precise for an
 20 old lawyer.
 21 When the computer was drawing your
 22 maps, it was not looking at partisan data?
 23 A. The computer did not have partisan data.
 24 Q. You looked at partisan data after your maps were
 25 drawn by the computer?

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1 A. I went back and took the outputted maps or
 2 outputted plans that my algorithm had produced
 3 and then I created additional files that
 4 calculate partisan calculations for each.
 5 Q. So before you could look at the partisan data
 6 for the districts your computer drew, you had to
 7 first have the districts, the districts had to
 8 be drawn first before you could get the reports
 9 on how they lined up for partisan vote share?
 10 A. Well, again, I didn't draw any districts, but
 11 the computer did certainly have to produce the
 12 simulated districting plans first.
 13 Q. Right. So these screenshots that you've listed
 14 in this section of your report, the districts
 15 would have to be drawn before you would get
 16 these screenshots. Is that right or wrong?
 17 A. No. So this is a little bit of a difference
 18 between how Maptitude works versus how, say, my
 19 computer simulation algorithm works. And if
 20 you're familiar with Maptitude, the whole point
 21 of Maptitude for redistricting is a map drawer
 22 can dynamically see various characteristics,
 23 including partisan characteristics, of the
 24 districts being drawn as they are being drawn.
 25 And that's the whole point of the pending

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1 changes window in Maptitude for redistricting.
 2 This is why Maptitude for redistricting
 3 is widely used by map drawers. It's because the
 4 map drawer is able to dynamically see updates of
 5 partisan data, of racial data, whatever data the
 6 map drawer has chosen to import into Maptitude,
 7 dynamically update it as the map drawer is
 8 constructing the districts. That's the --
 9 that's the beauty of Maptitude for
 10 redistricting.
 11 Q. Question.
 12 A. Sure.
 13 Q. Can the map drawer decide what he has on his
 14 screen as he's drawing the districts?
 15 A. Yes.
 16 Q. So he could draw the districts excluding the
 17 racial data?
 18 A. The map drawer can choose not to import in the
 19 racial data. The map drawer can choose not to
 20 create a formula field any part African American
 21 population, things like that. The map drawer
 22 can choose not to import in any election data or
 23 partisan data. The map drawer can choose all of
 24 those things.
 25 Q. But there can be information on his computer

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1 that he can exclude from the screen that he's
 2 looking at when he's drawing the districts;
 3 isn't that correct?
 4 A. So you're asking can you take data that you've
 5 already imported in and somehow exclude that.
 6 Q. From the screen when you're drawing the
 7 districts.
 8 A. Sure. You can scroll -- you can take your
 9 dataview window -- so the dataview window is
 10 just a window in Maptitude that will show you
 11 the characteristics of all 120 House districts,
 12 right, and you can delete columns from that if
 13 you wanted to. Those are certainly things that
 14 one could theoretically choose to do. You could
 15 start a new map with the same boundaries with
 16 the old map but only have a subset of the old
 17 data you had. In other words, you could take a
 18 draft map and import that into a completely new
 19 draft plan but then only bring in, say, the
 20 demographic data but not the racial data, say,
 21 the population data but not the racial data and
 22 maybe not the partisan data. You could do those
 23 things if you wanted to.
 24 Q. So when you're drawing the map on Maptitude, you
 25 can exclude from your screen things like racial

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1 data even though that may be in your computer?
 2 A. And I just want to make sure you understand what
 3 I'm saying when I'm trying to explain to you how
 4 you would go about doing that.
 5 You could delete columns. You could
 6 get rid of formula fields. You could start anew
 7 and create another redistricting plan that has
 8 the same boundaries as your old draft plan
 9 except this time you don't have racial data or
 10 you don't have partisan data. Any of those
 11 things, if you created a new draft plan, the
 12 backup would save that and we would be able to
 13 see in the backup that you had deleted a
 14 particular column or the column was no longer
 15 there.
 16 If this was a map that you had taken
 17 out the racial data or taken out the partisan
 18 data, something along those lines, that would be
 19 saved in the backup if that had happened. So,
 20 yes, you can certainly do those things.
 21 Q. So you don't know for sure what was on
 22 Dr. Hofeller's screen when he drew this map?
 23 A. The way that a Maptitude backup works is it does
 24 actually save the last view, the way that it was
 25 reviewed by the map drawer.

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1 Now, I don't believe that I included
 2 screenshots of that initial last view, in other
 3 words, exactly how it -- how the various windows
 4 were aligned, what was in the foreground and
 5 what was in the background, but the basic
 6 components of what you'll see any time you open
 7 up a Maptitude plan, you'll have one window that
 8 has the geography, whether it's VTDs that you're
 9 working with or district boundaries, the map
 10 itself, a depiction of the map, then you'll have
 11 kind of a dataview window. So there will be a
 12 Dataview 1 window that lists out all the
 13 districts and then you can have a pending
 14 changes window which sometimes will be labeled
 15 as Dataview 2, but it will be a pending changes
 16 window that will tell you about various
 17 characteristics that you're actually changing so
 18 you can see dynamic updated statistics on those
 19 things.
 20 So these are all just essential, basic
 21 features of any sort of Maptitude plan draft.
 22 Q. So the dataview window is where the racial data
 23 would be?
 24 A. That's one of the places.
 25 Q. I want to know where it would be when he was

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1 drawing the map the first time.
 2 A. I'm sorry, I didn't mean to cut you off there.
 3 Q. No. I didn't -- I'm sorry, I'm not an expert on
 4 Maptitude so you don't need to shake your head
 5 when I ask the question. Okay.
 6 When he's drawing the map, where on the
 7 screen would you see the racial data as he's
 8 drawing the map?
 9 A. Yeah, that's a good question. The Dataview 1
 10 window is one of those places that I saw that
 11 racial data. I also saw racial columns, racial
 12 headers in the pending changes window, and for
 13 one map that I wrote about in some detail in one
 14 draft plan, I should say that I wrote about in
 15 some detail in my response report, I actually
 16 found the racial data on labels on the district
 17 map itself. In other words, I saw a map -- and
 18 here I'm referring to page 44 of my response
 19 report, Figure 28, page 44 of my response
 20 report, Figure 28.
 21 And I saw a map in which Dr. Hofeller
 22 had actually labeled the districts of that map
 23 with two pieces of information. Number one, the
 24 district number just identifying the district,
 25 and number two, the African American any part

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1 black voting age population percentage of that
 2 district, and that was prominently labeled on a
 3 map of this draft House districting plan.
 4 So those are the various places where
 5 one might find and where I in fact did find
 6 racial data in this particular draft House map.
 7 Q. So this information that you are describing, is
 8 this information that you got from Stroz
 9 Friedberg?
 10 A. This is information that I saw looking at the
 11 draft Maptitude folders in Maptitude. I simply
 12 opened up Dr. Hofeller's backup files and I saw
 13 them on the screen. Stroz Friedberg told me
 14 nothing about, say, the content of these
 15 Maptitude folders.
 16 Q. Do you know -- can you tell with any certainty
 17 what information was on Dr. Hofeller's dataview
 18 screen when he first drew this map?
 19 A. Yeah. I can say with certainty that the
 20 dataview -- I'm just going to use one of these
 21 draft maps as an example.
 22 So I produced the Dataview 1 window for
 23 a draft map called NC House J-25003 which was
 24 last modified on August 14, 2017.
 25 Q. Is that on page 42?

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1 A. It is on page 41 and 42. And so it's Figure 25
 2 and Figure 26. And so I produced a screenshot
 3 of the Dataview 1 window, and I can say with
 4 certainty that this was the dataview window that
 5 Dr. Hofeller had up on the screen when he last
 6 was working with this particular Maptitude
 7 folder.
 8 The only thing that I did or I had
 9 Mr. Esselstyn do was to take a screenshot, and
 10 prior to taking a screenshot maneuver the
 11 windows around, move the windows left to right
 12 so that it would be positioned so that the
 13 screenshot would capture all the columns or some
 14 subset of the columns that I wanted to zoom in
 15 on. So I asked Mr. Esselstyn, move the window
 16 over here to the left so the screenshot will get
 17 as much of the dataview window as we can,
 18 something along those lines. So that's how I
 19 was able to ask Mr. Esselstyn to get this huge
 20 screenshot on Figure 25 that I wanted to have
 21 every single column. So obviously I had to ask
 22 him to expand that column so that you'd be able
 23 to see all of the columns on one screenshot
 24 since obviously it's a screenshot so you can't
 25 really scroll to the left or to the right.

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1 You've got to get everything that you want to
 2 show in that one screenshot, so that's what I
 3 did.
 4 So the point is I'm able to say this
 5 Dataview 1 window was the one that was available
 6 to Dr. Hofeller when he last worked with this
 7 particular draft Maptitude folder.
 8 Q. When he last worked with it. What I want to
 9 know whenever he first -- the first time he drew
 10 it, do you know what was on his screen when he
 11 was drawing the map?
 12 MR. JACOBSON: Objection.
 13 THE WITNESS: That information might
 14 possibly be in another backup, but I did not
 15 analyze that for this particular draft map.
 16 So in general, what a backup does, it's
 17 a snapshot and it's whenever that snapshot was
 18 created. So I can tell you what was on
 19 Dr. Hofeller's Maptitude folder when it was last
 20 backed up. I can't tell you about previous
 21 backup versions.
 22 BY MR. FARR:
 23 Q. So you can't testify when he first drew this
 24 map, you can't tell what was on his screen?
 25 MR. JACOBSON: "This map" is vague.

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1 BY MR. FARR:
 2 Q. The beginning of this map, the first version of
 3 this map that he would have drawn.
 4 A. I do think it's vague, and I'm going to explain
 5 to you why. These maps are -- go along in a
 6 series of something like -- this one here is
 7 called House J-25003. There are other maps in
 8 this same sort of series that start with J-25,
 9 and so there may well be -- may well be earlier
 10 versions of this draft map.
 11 And I'm not sure exactly what you mean
 12 by "this map," if you're referring to the entire
 13 series or this one backup. So I'm not totally
 14 clear what you mean when you say "this map."
 15 Q. Let's say the first version of a House draft map
 16 that Dr. Hofeller drew, you can't testify what
 17 was on the screen when he did that?
 18 A. You said an earlier draft map?
 19 Q. The first draft House map he did in 2016 or
 20 whenever he started because I don't know when he
 21 started.
 22 A. Sure. I did not look at every draft map from
 23 Dr. Hofeller's hard drive to be able to identify
 24 which one was the, quote, first draft map. I
 25 looked at some maps. I obviously did not look

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1 at every single Maptitude backup.
 2 Q. Okay. What is the -- what's Figure 27?
 3 A. This is a formula window, and I'll just explain
 4 a little bit of background that will help put
 5 this in some context.
 6 In Maptitude you have obviously one
 7 window that shows you the map of North Carolina,
 8 and that can be -- can be shown or displayed or,
 9 I guess, shaded in at a number of different
 10 levels. You could shade in, for example, some
 11 characteristic of the VTD but shade in some
 12 characteristic of the district, of a house
 13 district and so on. You can do any number of
 14 things. You could show county level
 15 characteristics if you really wanted to.
 16 What a formula field does is it allows
 17 the Maptitude user, the map drawer, to create
 18 labels for the districts, and you can put in
 19 these labels whatever information you want as
 20 long as that's information that you have
 21 imported into Maptitude already. So sometimes a
 22 map drawer might just want to label the
 23 districts by the district number, so you'll have
 24 a label for District 1 and a label for
 25 District 2 and so on, but that's not the only

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1 thing you could do. You could label a district
 2 by its population. That's just as another
 3 example.
 4 Those are just examples, but that's
 5 done in the formula window here. And so the
 6 formula window allows the map drawer to create a
 7 formula. And when I say formula, it's really
 8 nothing very fancy. It's just a very simplistic
 9 sort of set of instructions telling Maptitude
 10 what to display on the labels for each district.
 11 And so we were able to look at -- we
 12 were able to look at the formula field for this
 13 particular draft map that Dr. Hofeller had
 14 developed, and the formula field reveals the
 15 following. It reveals there were two pieces of
 16 information in this particular draft map that
 17 Dr. Hofeller chose to display for every
 18 district. Those two pieces of information are
 19 in this box in the formula window that's
 20 displayed here on Figure 27.
 21 So just to orient where we are on where
 22 this box is, again, Figure 27 is a screenshot of
 23 the entire Maptitude -- of the Maptitude
 24 program, and towards the center of this
 25 screenshot, kind of on the upper end of the

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1 center, you see this window that's labeled as
 2 Formula (dataview: Districts). So it's a
 3 formula that you can create at the district
 4 level, and Dr. Hofeller created such a formula.
 5 Dr. Hofeller's formula is in the box
 6 that appears right below there. The formula has
 7 two pieces of information. Number one is the
 8 district number, and then number two -- so that
 9 next line that you see right after the word
 10 district, that's just kind of like a line break.
 11 It's just telling the Maptitude program go to
 12 the next line, and then the next line is the
 13 rest of that line there.
 14 The next line that would be displayed
 15 on the label would be what's in the rest of this
 16 formula field box. It says Format (% 18
 17 plus_AP_BLK).
 18 Now, it's pretty clear what's going on
 19 there, what information that is. That's the
 20 percent any part African American voting age
 21 population. It says 18 plus because that's how
 22 one would typically or how many people will
 23 abbreviate voting age population. And AP stands
 24 for any part. BLK stands for black. So it's
 25 any part African American VAP population. And

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1 that's exactly what Dr. Hofeller wrote in that
 2 formula field. And when I look at the label
 3 itself, I see the labels that actually have
 4 racial data, that actually have the any part
 5 African American voting age population labels
 6 for every district.
 7 So that was kind of the background of
 8 understanding what exactly this screenshot here
 9 in Figure 27 is showing us.
 10 Q. Okay. And that screen was last updated on
 11 August 14th?
 12 A. Not the screenshot. I'm sorry.
 13 Q. What does that mean, August 14, 2017?
 14 A. So again, the screenshots are all screenshots
 15 that I took or I directed Mr. Esselstyn to take
 16 so they were all obviously screenshotted a
 17 couple weeks ago.
 18 The actual draft House map, the draft
 19 plan of Dr. Hofeller's, this Maptitude backup
 20 folder, this was last modified on August 14,
 21 2017. The screenshot itself is my own
 22 screenshot of the Maptitude backup file.
 23 Q. And then if you look to Figure 28, same
 24 testimony for that, when it was last modified by
 25 Dr. Hofeller?

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1 A. Same day, August 14th.
 2 Q. Now, did you uncover any evidence that
 3 Dr. Hofeller was drawing districts to hit a
 4 50 percent or higher racial target for African
 5 Americans?
 6 A. I didn't analyze that question.
 7 Q. Did you determine whether Dr. Hofeller was using
 8 racial data to draw districts at any targeted
 9 level for African Americans?
 10 A. I didn't analyze that question.
 11 Q. Did you determine whether or not Dr. Hofeller
 12 was dividing VTDS to separate people based upon
 13 race?
 14 A. I didn't analyze that question.
 15 Q. I'll turn to Figure 29. Can we -- do you want
 16 to turn on the air-conditioning?
 17 Is Figure 29 a screenshot that -- I
 18 can't remember the guy's name.
 19 A. Mr. Esselstyn.
 20 Q. I'll say Mr. --
 21 A. You can call him Mr. E and I'll --
 22 Q. Okay.
 23 Did Mr. E make that screenshot for you?
 24 A. Yes, I directed him to take a screenshot. And
 25 this is a different draft plan than the one we

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1 were previously looking at.
 2 Q. This is a draft plan for the Senate?
 3 A. Correct.
 4 Q. And it was last -- I don't know if I'm using the
 5 right word -- updated by -- you think it was
 6 last updated by Dr. Hofeller on August 13th?
 7 A. It was last modified on August 13, 2017.
 8 Q. Are there any other files in your report that
 9 you received from Stroz Friedberg or someone
 10 else?
 11 A. Yes, there are. You want me to point to where
 12 they are?
 13 Q. I just want to make sure that we know where you
 14 got everything that's in your report.
 15 A. Sure. If you're ready to move on, I can direct
 16 you to where the rest of those are.
 17 Q. Sure. Good.
 18 A. So the rest of them I'll be able to give you --
 19 and I assume you're just going to ask me -- and
 20 I'll go ahead and answer, you're going to ask me
 21 how I came to -- how those files came to be
 22 delivered to me.
 23 Q. Yes.
 24 A. So the last set of files are going to be
 25 described in the next section of my report which

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1 is titled -- and it begins on page 48. The
 2 section is titled Response to Dr. Brunell,
 3 Dr. Hood and Dr. Johnson's Claims Regarding
 4 Partisan Intent.
 5 In the section I refer to a pretty
 6 lengthy number of Microsoft Excel files and I
 7 believe one Microsoft Word document. So I'll
 8 give you a blanket statement regarding all of
 9 these, which is that these files were all
 10 delivered to me in the form of two folders that
 11 I listed somewhere in my report. If you give me
 12 a minute, I'll give you the precise names,
 13 something like 2017 NC redistricting, but I'm
 14 going to find exactly where I listed this.
 15 MR. JACOBSON: I think it's on page 76.
 16 THE WITNESS: Yeah. So I'll direct you
 17 to the first paragraph on page 76, and I've
 18 listed two folders called NC 2017 Redistricting
 19 and 2017 Redistricting.
 20 These folders which contained several
 21 large -- a large number of files were given to
 22 me by Stroz Friedberg, and it's my understanding
 23 that plaintiffs' counsel asked Stroz Friedberg
 24 to give me copies of those two folders and to
 25 look at the files inside of them.

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1 BY MR. FARR:
 2 Q. Okay. Does that complete your explanation of
 3 where you got the information for this report?
 4 Was there anything else?
 5 A. Oh, yeah, let me -- I'll just scan through the
 6 rest of my report, but I believe that's about
 7 it. I believe the rest of my report does not
 8 refer to any more files that came from
 9 Dr. Hofeller's hard drive. I'll just scan
 10 through just to check.
 11 Q. Okay. Did you do any research on the background
 12 of Dr. Hofeller's involvement in crafting the
 13 2017 House and Senate plans?
 14 A. I didn't do any research of my own aside from
 15 the information I was given by plaintiffs'
 16 counsel and some of the things that we've
 17 already talked about earlier today.
 18 Q. Do you know who hired him to work on the 2017
 19 plans?
 20 A. I don't know specifically who.
 21 Q. Do you know when Dr. Hofeller was hired to
 22 actually draw the 2017 House and Senate plans?
 23 A. I have a recollection that I might have written
 24 my information about that somewhere in my
 25 report. I'm not entirely certain so I'm going

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1 to look.
 2 I'm not recalling if I wrote it in my
 3 report. As I recall, though, my information
 4 given to me from plaintiffs' counsel was
 5 June 27, 2017.
 6 Q. He was hired on June 27th?
 7 A. That's my recollection right now. I may be
 8 misremembering. I'm just giving you the best of
 9 my memory.
 10 I do recall that plaintiffs' counsel
 11 gave me that information and that I had it in
 12 my -- under consideration when I was writing my
 13 report. And I may be misremembering. I'm just
 14 giving you the best of my memory right now.
 15 Q. Do you know whether Dr. Hofeller did his work on
 16 a specific computer after he was hired to draw
 17 the 2017 House and Senate plans?
 18 A. I did not analyze that question.
 19 Q. Did you test any of these draft maps that were
 20 on Dr. Hofeller's computer devices to determine
 21 if they complied with the adopted criteria as
 22 explained by Senator Hise and Representative
 23 Lewis in the exhibits we looked at for the
 24 committee proceedings?
 25 A. I'm going to ask the court reporter to repeat

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1 that question.
 2 (Record Read.)
 3 THE WITNESS: I take it that you were
 4 referring to the proceedings of August 25th and
 5 August 24, 2017.
 6 BY MR. FARR:
 7 Q. I think those are Exhibits 5 and 6. Yes?
 8 A. Okay. And so it wouldn't really make sense for
 9 me to have to do a test because obviously a lot
 10 of Dr. Hofeller's drafting of the maps occurred
 11 before that time. In fact, much of it even
 12 occurred before the adopted criteria were passed
 13 on August 10th and so that wouldn't really make
 14 sense to me to even test that because logically
 15 Dr. Hofeller could not have been following the
 16 adopted criteria prior to August the 10th.
 17 As I explained in my report, much of
 18 the House -- the General Assembly's House and
 19 Senate districting plans were already in place,
 20 were already drafted up by Dr. Hofeller back in
 21 June.
 22 Q. Okay. That's like a really hyper technical
 23 answer, Dr. Chen.
 24 What I want to ask you is: Did you
 25 test the draft maps that Dr. Hofeller -- that

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1 you talked about here today, did you look to see
 2 whether or not they complied with the criteria
 3 that the committee ultimately adopted on equal
 4 population?
 5 A. Okay. Same general answer as before as it
 6 wouldn't have made sense for me to test them
 7 with respect to the adopted criteria generally,
 8 but I get that you're asking me a specific
 9 question about equal population.
 10 So if your question to me is whether or
 11 not I looked for whether the draft districts
 12 were within 95 to 105 percent, the answer is
 13 that I didn't do that.
 14 Q. Did you look to see whether the draft maps
 15 Dr. Hofeller, you claim, prepared based upon
 16 your review of the information you received
 17 complied with the county grouping and traversal
 18 criteria that was ultimately adopted by the
 19 committees?
 20 A. I didn't.
 21 Q. Okay. Did you determine whether or not the
 22 districts on these draft maps that appear to be
 23 drawn by Dr. Hofeller were the districts that
 24 were changed more compact than the districts in
 25 the 2011 plan? Did you check for that?

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1 A. I did not do my own compactness analysis on
 2 Dr. Hofeller's draft maps, draft plans.
 3 Q. And did you determine whether or not the draft
 4 maps divided fewer municipal lines than the 2011
 5 plans?
 6 A. I did not.
 7 Q. Did you determine whether Dr. Hofeller's draft
 8 divided fewer precincts than the 2011 plans?
 9 A. I did not.
 10 Q. Did you evaluate whether Dr. Hofeller's draft
 11 plans provided an opportunity for voters to
 12 reelect their incumbents?
 13 A. I'm not sure what you mean by that.
 14 Q. Did you determine whether or not the incumbent
 15 Republican in a particular district would have a
 16 chance of getting reelected under the draft
 17 district that Dr. Hofeller drew?
 18 A. Like I said, I just don't know what you mean by
 19 chance of getting reelected. I can tell you
 20 that I certainly looked at files in which
 21 Dr. Hofeller expressed some point of interest
 22 regarding certain Republican incumbents and
 23 whether he believed -- how he believed that
 24 their electoral prospects might be affected by
 25 different draft maps of his.

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1 THE WITNESS: Oh, okay. I misheard
 2 you, then, and so I've got to retract the
 3 answers I gave you which is based on a different
 4 file than the one I thought you were pointing
 5 to.
 6 So do you want to go ahead and ask your
 7 question again.
 8 BY MR. FARR:
 9 Q. Okay. What type of data is stored in NC House
 10 J-25.bin?
 11 A. I'd have to look at it to be sure. There are a
 12 couple of different bin files that you'll find
 13 in any Maptitude backup folder and I'd actually
 14 have to have the file in front of me to give you
 15 any sort of clue.
 16 Q. Do you know what data is stored in NC House
 17 J-25.map?
 18 A. Generally, yes, except that you're not putting
 19 this file in front of me so I can't actually
 20 tell you about this actual file. I'm generally
 21 familiar with the idea of a .map file within a
 22 Maptitude folder and can tell you a little bit
 23 about that, but --
 24 Q. What would that be?
 25 A. Sure. I mean, a .map file is sort of like a

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1 MR. FARR: Let's mark this.
 2 (WHEREUPON, Chen Exhibit 15 was marked
 3 for identification.)
 4 BY MR. FARR:
 5 Q. Dr. Chen, do you know what this is?
 6 A. I didn't -- I've never seen this. It looks like
 7 he took a screenshot of something, but I've
 8 never -- I obviously didn't create this
 9 screenshot.
 10 Q. Is that a list of the folders for NC House
 11 J-25003 (2017628).bak.zip?
 12 A. They could be. They might not be. If you want
 13 to represent to me what it is, I'm happy to
 14 accept that.
 15 Q. I think that's what it is. I want you to look
 16 at NC House J-25.bin. Do you see that on
 17 Exhibit 15?
 18 A. Yes.
 19 Q. Do you know what data is stored in that bin?
 20 A. Well, I don't have the file in front of me here.
 21 I mean, it's obviously a BMP file. It's some
 22 kind of image file.
 23 MR. JACOBSON: Did you say BIN or BMP?
 24 Did you mean BIN or BMP?
 25 MR. FARR: I think I meant BIN.

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1 recipe. It's not really the map itself. It's
 2 not the district boundary itself or the precinct
 3 boundaries themselves, but it's the recipe for
 4 how things are displayed. And so when you save
 5 a Maptitude backup, you've got a .map file that
 6 has this recipe showing what is displayed,
 7 different -- different formulas that can be
 8 displayed, things along those lines. So that's
 9 generally what's included. I would just
 10 describe it as kind of a recipe for the view
 11 that the user last has in Maptitude. It kind of
 12 gives us a roadmap for what was being displayed
 13 on the Maptitude software as of the time that
 14 the folder was last backed up.
 15 But obviously, what you put in front of
 16 me is just a list of these various file names
 17 and you're not actually letting me see the
 18 actual files in front of me here so I can't be
 19 really specific beyond giving you a generality
 20 like that.
 21 Q. Okay. I haven't seen them either, Dr. Chen.
 22 So what about NC House J-25.rdp, what
 23 would be stored there?
 24 A. It's again just another part of the Maptitude
 25 redistricting backup folder. I don't

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1 specifically remember what type of information
 2 is stored here. I just generally know it's part
 3 of how a Maptitude plan is stored.
 4 Q. Okay. That's all on that.
 5 I think -- correct me if I'm wrong, but
 6 you've offered an opinion that a map was drawn
 7 as of June 28, 2017?
 8 A. I believe that you are referring to the House
 9 map that's titled House J-25003. I think that's
 10 what you're referring to.
 11 Q. Yeah. How do you know that was drawn as of
 12 June 28, 2017?
 13 A. Okay. What I said was last modified. This is a
 14 Maptitude backup folder containing a draft plan,
 15 and it was last modified -- the backup was last
 16 modified on June 28th. And so what I did is I
 17 looked at the Windows metadata for the last
 18 modified date and I wrote down the date that I
 19 saw.
 20 Q. Does the metadata say when the map was first
 21 drawn?
 22 A. No. It's last modified so at some point there
 23 already existed a draft map. Dr. Hofeller
 24 appeared to have his Maptitude program set up in
 25 a way to automatically save backups when certain

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1 actions were taken, say, on his Maptitude
 2 program, and so there were backups taken, and
 3 the last modified date for this plan was
 4 June 28th.
 5 Q. Okay. Did you get a chain of custody for this
 6 information that you reviewed?
 7 MR. JACOBSON: Objection; vague.
 8 THE WITNESS: I don't know what the
 9 question means.
 10 BY MR. FARR:
 11 Q. Well, do you know the people that put their
 12 hands on this from the time it was sent by
 13 Stephanie Hofeller to when it got to you?
 14 A. Well, I think I've given you all the information
 15 that I have, and I'm happy to review it again,
 16 but I received -- and again, I think -- if
 17 you're referring specifically to this Maptitude
 18 folder -- any of these other Maptitude folders
 19 I'm mentioning, I told you I got it from Stroz
 20 Friedberg and I told you what plaintiffs'
 21 counsel told me about the providence.
 22 Q. But you don't have a chain of custody line
 23 showing who touched the stuff by the time it was
 24 delivered by Stephanie Hofeller?
 25 A. Again, I don't know what that question means.

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1 Again, I'm telling you I've told you everything
 2 that I know.
 3 Q. So on page 2 of your report you say Dr. Hofeller
 4 assigned 90.9 percent of the state's census
 5 blocks into House districts containing
 6 88.2 percent of the population.
 7 A. Yes.
 8 Q. When you compared the June 28th draft to the
 9 final enacted plan, only 9.1 percent of the
 10 census blocks had changed; is that correct?
 11 A. I see that, yes.
 12 Q. How did you perform this analysis?
 13 A. Sure, I'm happy to walk you through this, and I
 14 think it might be useful if we just look at
 15 maybe the first figure.
 16 Q. What page are you on?
 17 A. So I'll just direct you to page 4, Figure 1.
 18 What I'm going to tell you, I'm just going to
 19 explain this in a general way that applies
 20 equally to any of these figures in the first
 21 couple pages of my report.
 22 So what I did to produce these
 23 calculations -- and I'm going to start all of
 24 this by saying in the first section of my report
 25 which goes all the way until I believe page 37,

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1 I think, or page 38, I guess, I do explain in
 2 detail how I produced these calculations. So
 3 I'm just going to say that's the basis of the
 4 answer I'm about to give you, and I'll give you
 5 my answer kind of at a high level and you can
 6 ask for a more detailed answer if you like.
 7 So what I did is I looked grouping by
 8 grouping, and so within each grouping -- and
 9 we'll just start with Mecklenburg in Figure 1 as
 10 an example. There are 12 districts in the
 11 Mecklenburg House grouping. And so, of course,
 12 there were 12 districts in Dr. Hofeller's draft
 13 plan for Mecklenburg. And for each of the
 14 districts in Dr. Hofeller's draft map -- and
 15 when I use the phrase draft map in this context,
 16 right now I'm talking about this draft map
 17 NC House J-25003.bak.zip which was last modified
 18 on June 28, 2017, which I reference in my report
 19 starting on page 3.
 20 I look through Dr. Hofeller's districts
 21 in Mecklenburg, and for each district I
 22 identified the corresponding district in the
 23 final House Bill 927 plan from August 2017. And
 24 what I mean by corresponding district is I
 25 identified for each of Dr. Hofeller's draft

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1 districts the House Bill 927 district that most
 2 overlaps in population with Dr. Hofeller's draft
 3 district, and so I did this for each one of
 4 Dr. Hofeller's 12 districts -- draft districts
 5 here in Mecklenburg. So I first identified a
 6 corresponding district in the final House
 7 Bill 927 plan.

8 Q. Can I ask you a question.
 9 What do you think most overlaps by
 10 population? How did you measure that?

11 A. Okay. I counted the population overlap between
 12 Dr. Hofeller's draft district and every one of
 13 the 12 districts in the final House Bill 927
 14 plan, and the corresponding district is the one
 15 who shares the most population with
 16 Dr. Hofeller's draft district. So that's what I
 17 mean by overlap in population. You determine
 18 how much do each of the 927 -- the final House
 19 Bill 927 plan district share a common population
 20 that is also in the particular Dr. Hofeller
 21 draft district that I'm looking at, and I
 22 identify the corresponding district.

23 Just to kind of simplify this, you can
 24 obviously see from Figure 1 that the
 25 corresponding district for District 107 in

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1 Dr. Hofeller's draft map is also named
 2 District 107 in the final House Bill 927 map,
 3 and that's almost always the case that the
 4 numbers did not change. There was only one
 5 instance here where it did change.

6 What Dr. Hofeller had drawn as District
 7 Number 88 later became renamed or renumbered as
 8 District 92 in its exact same form, no changes
 9 in the boundaries, but it was renumbered as
 10 District Number 92. So I would call District
 11 Number 92 the corresponding district to
 12 Dr. Hofeller's draft 88 -- draft District 88.
 13 So that's how I identify corresponding
 14 districts.

15 Now, on to the actual calculations.
 16 What you see in this figure is the percent
 17 overlap in population that had overlap from
 18 Dr. Hofeller's draft districts to the
 19 corresponding districts in the final House
 20 Bill 927.

21 Now, what I did for the entire draft
 22 plan, all 120 draft districts in Dr. Hofeller's
 23 draft plan is I counted up the degree to which
 24 how much population actually overlaps with each
 25 of Dr. Hofeller's draft district, corresponding

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1 district in the final House Bill 927 plan.
 2 And as you can see from this figure,
 3 for most of the districts in Mecklenburg, it's
 4 actually 100 percent overlap, and then you'll
 5 see that there's one district that's at
 6 96 percent, another district at 95.97 percent
 7 and so on.

8 But I counted the population overlap
 9 for each of these districts, and I added that
 10 overlapping population for all 120 districts,
 11 then divided by North Carolina's total
 12 population, and that's how we arrived at the
 13 number 88.2 percent.

14 I did a similar calculation except
 15 instead of using population I looked at the
 16 number of census blocks. In other words, I was
 17 asking what percentage -- or how many census
 18 blocks from Dr. Hofeller's draft District 107
 19 overlapped with or are also assigned to
 20 District 107 in the final House Bill 927 plan.
 21 And obviously you can see here that that answer
 22 would be 100 percent.

23 But I did that for census blocks as
 24 well. So I calculated for the entire state what
 25 percentage of North Carolina census blocks were

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1 already in place in their corresponding final
 2 districts in the final House Bill 927 plan by
 3 the time that Dr. Hofeller drew this draft map
 4 in late June of 2017, and that percentage turned
 5 out to be 90.9 percent. So that's how these two
 6 numbers came to be calculated.

7 Q. What software did you use to do this?
 8 A. I didn't use software. I wrote my own code. I
 9 calculated it in -- its call the R programming
 10 language. And just to explain, that's -- this
 11 is what I do a lot of my analysis in. If you
 12 look at my backup files or my computer code
 13 files, you'll see a lot of it is written in R
 14 code.

15 Q. And the percentages you calculated in the
 16 beginning of paragraph 11, those are statewide
 17 percentages?
 18 A. Paragraph 11? Where are you?
 19 Q. I'm sorry. My question 11.
 20 A. The answer to your Question Number 11,
 21 Dr. Hofeller, is --
 22 MR. JACOBSON: You said Dr. Hofeller.
 23 THE WITNESS: I'm just going to stop
 24 trying to talk after 7:00 p.m. here.
 25 MR. FARR: My problem.

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1 BY MR. FARR:
 2 Q. The percentages you calculated of 90.9 percent
 3 of the state census blocks, that's a statewide
 4 percentage?
 5 A. That is a statewide percentage, so it's a
 6 percentage of the total number of census blocks
 7 in North Carolina which is obviously several
 8 hundred thousand.
 9 Q. And 88.2 percent is a percentage of the
 10 statewide population?
 11 A. Correct.
 12 Q. Can we turn to your Orange County figures?
 13 A. If you'll direct me to the precise page.
 14 Q. I believe it's page 9 of your report.
 15 A. Okay.
 16 Q. At the top you refer to a file that is
 17 House J-25.
 18 A. Yeah, that's just a short form. I'll point you
 19 to where the full name of the file is. It's
 20 listed at the top of page 3, and I think I read
 21 it out a couple times now. It's NC House
 22 J-25003.bak.zip. So J-25 is just kind of
 23 shorthand.
 24 Q. Was this a bak.zip file?
 25 A. I think you're trying to say bak.zip.

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1 Q. Yeah.
 2 A. Like I was saying earlier, that originally came
 3 from a Maptitude backup file which is what
 4 bak.zip is. It's a Maptitude backup. So that's
 5 where originally I -- that's where originally
 6 the draft plan came from. I think I explained
 7 in a footnote on page 2, or actually it's just a
 8 starred note at the bottom of page 2, I just
 9 explained exactly how I came to get a shape file
 10 version.
 11 I specifically just instructed
 12 Mr. Esselstyn to export the draft House map in
 13 this backup in the form of a shape file which he
 14 then transmitted to me, and that's what I
 15 explained in that footnote on page 2.
 16 Q. Do you have a different code for this particular
 17 map than the code you recited for Dr. Hofeller's
 18 draft plan?
 19 A. If I could ask you to repeat.
 20 Q. Let's turn to your Senate analysis. Could you
 21 tell me the name of the Senate folder that you
 22 studied?
 23 A. I'm going to find where the section begins
 24 first. Okay, the section begins on page 25, the
 25 section entitled Dr. Hofeller's Draft Senate Map

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1 of June 24, 2017.
 2 Your question was what the file or what
 3 the Maptitude folder was named, and I've listed
 4 it right there on the first line of the section
 5 so I'll read it out. The folder was named
 6 NC Senate J-24001.bak.zip. And it had a last
 7 modified date of June 24, 2017.
 8 Q. Did you analyze any other draft Senate maps
 9 within the computer data obtained from
 10 Dr. Hofeller's daughter?
 11 A. Yeah, I think we've talked about some of them
 12 before, and I'm happy to revisit that again, but
 13 I think I showed you or we talked about some of
 14 the draft maps that I looked at in the second
 15 section of my report. Some of them are listed
 16 on page 47. So, yeah, generally there were
 17 others, and I think I've listed some of them
 18 already for you.
 19 Q. Somewhere in your report you've got a statement
 20 made by Senator Hise about racial data. Could
 21 you try to find that for me. I think it's on
 22 page 39.
 23 A. Sure. I think you're right.
 24 (WHEREUPON, Chen Exhibit 16 was marked
 25 for identification.)

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1 BY MR. FARR:
 2 Q. I'm sorry, Dr. Chen, I think I pulled the
 3 wrong -- no, I did.
 4 16 is a page from the -- transcribed
 5 from the Senate Redistricting Committee hearing,
 6 and if you look at the first paragraph there
 7 attributed to Senator Hise, the last sentence in
 8 that paragraph, is that the one you're referring
 9 to in your report?
 10 A. Yes.
 11 Q. Okay. Do you have any evidence that that's a
 12 false statement by Senator Hise as it relates to
 13 the state computer upon which the maps offered
 14 by Senator Hise and Representative Lewis were
 15 offered to the committees?
 16 A. Generally, I was not trying to assess the
 17 veracity of that statement. I don't know what
 18 computers you're talking about so obviously I'm
 19 not going to be able to speak to that.
 20 Q. Okay. So you're not accusing Senator Hise of
 21 lying?
 22 A. No, sir. I simply took that statement to help
 23 clarify a part of the -- a portion of the
 24 adopted criteria as it related to no
 25 consideration of racial data.

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EXHIBIT 20

Blakeman B. (“Blake”) Esselstyn

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EDUCATION

- University of Pennsylvania, School of Engineering and Applied Science, Master of Computer and Information Technology, 2003; GPA 4.0
- Yale University, Geology & Geophysics and International Studies, Bachelor of Arts, 1996

PROFESSIONAL CERTIFICATIONS

- Geographic Information Systems Professional (GISP), #6946, 2009
- American Institute of Certified Planners (AICP), #026364, 2013

EMPLOYMENT (Teaching positions listed separately)

- Redistricting Consultant, EQV Maps (and as Blake Esselstyn), Asheville, NC, 2016-present
- Principal Consultant, FrontWater, LLC, Asheville, NC, 2015-present
- Urban Planner III – GIS Specialist, City of Asheville Department of Planning and Urban Design, Asheville, NC, 2008-2015
- Urban Planner II, City of Asheville Planning Department, Asheville, NC, 2004-2008
- Independent GIS Consultant, Freelance, Asheville, NC, 2003-2004
- GIS Programmer, Azavea, Inc., Philadelphia, PA, 2002
- Web Support Fellow, University of Pennsylvania, Philadelphia, PA, 2002
- GIS Analyst, Applied Geographics, Inc., Boston, MA, 2001
- GIS Intern, Community and Environmental Spatial Analysis Center, Seattle, WA, 2000
- GIS Analyst, Applied Geographics, Inc., Boston, MA, 2000
- Mapping Technician, Schlosser Geographic Systems, Seattle, WA, 1997
- Digital Mapping Resources Consultant, Social Science Statistical Laboratory at Yale University, New Haven, CT, 1997
- Special Assistant to the CityRoom Coordinator, Neighborhood Partnerships Network, New Haven, CT, 1996-1997
- Lab Monitor, Center for Earth Observation at Yale University, New Haven, CT, 1995

TEACHING EMPLOYMENT

- Adjunct Faculty, Lenoir-Rhyne University, Asheville, NC, 2019
Taught full-semester graduate-level Geographic Information Systems (GIS) course
- Adjunct Faculty, Western Carolina University, Asheville, NC, 2017
Taught full-semester graduate-level GIS course
- GIS Course Assistant, University of Pennsylvania, Philadelphia, PA, 2002-2003
Served as teaching assistant for two undergraduate GIS semester courses
- Teacher, Equity American School, Guatemala City, Guatemala, 1998-1999
Led mathematics department for grades 7-12; taught one technology course
- Teacher, International School of Panama, Panama City, Republic of Panama, 1997-1998
Taught computer programming and mathematics to secondary school students

SPEAKER OR PANELIST

- “Methods and Techniques in Redistricting,” Harvard Geography of Redistricting Conference, Cambridge, MA, 2019
- “Redistricting Software: A new generation of geospatial tools,” North Carolina GIS Conference, Winston-Salem, NC, 2019
- “The Latest Mapping Technology,” Reason, Reform & Redistricting Conference, Duke University, Durham, NC, 2019
- “What are all These Districts? How did We Get Here, and Redistricting Reform,” Grassroots Democracy: A Nonpartisan Voter Education Series, Leicester, NC, 2019
- “Re-GIS-tracting? A new generation of redistricting geo-tools,” Mountain Regional GIS Alliance, Asheville, NC, 2019
- “Representing (mis)representation,” Tapestry Data Storytelling Conference, University of Miami, Miami, FL, 2018
- “A Redistricting Tour,” Democracy in our Hands Conference, Asheville, NC, 2018
- “Dis-tricks: GIS and Public Understanding of Redistricting,” NC ArcGIS Users Group, Asheville, NC, 2018
- “Visual Explanations of Gerrymandering,” Highlands Indivisible, Highlands, NC, 2018
- “Dave’s Redistricting App,” Metric Geometry of Gerrymandering Workshop, University of Texas, Austin, TX, 2018
- “Districting Voter Education Forum,” Democracy North Carolina, Asheville, NC, 2017
- “When GIS leads planners astray,” American Planning Association National Conference, New York, NY, 2017

- “Conveying Uncertainty with GIS,” Azavea, Philadelphia, PA, 2017
- “GISkepticism,” Appalachian State University, Boone, NC, 2017
- “When GIS leads planners astray,” North Carolina Planning Conference, American Planning Association North Carolina Chapter, Asheville, NC, 2016
- “What if the ‘S’ in GIS stood for Skepticism?” Mountain Regional GIS Alliance, Asheville, NC, 2015
- “Open Data? Show Me the Money!” North Carolina GIS Conference, Raleigh, NC, 2015

TEACHING AS SINGLE-CLASS GUEST SPEAKER (On redistricting and/or GIS)

- Lenoir-Rhyne University, Public Policy Processes Course (speaking on redistricting), 2019
- Western Carolina University, Geographic Information Systems Course (speaking on GIS), 2019
- Duke University, Democracy Lab Seminar (speaking on redistricting software tools), 2018
- University of North Carolina Asheville, Political Science: US Elections Course (speaking on redistricting), 2018
- University of North Carolina Asheville, Mathematics: Voting Theory Course (speaking on redistricting), 2018
- Lenoir-Rhyne University, Sustainability Management & Decision Making Course (speaking on GIS/location intelligence), 2018
- Yale University, School of Organization and Management: Business Information Course (speaking on Maptitude—one class + multiple labs), 1997

LITIGATION EXPERIENCE (As GIS expert)

- Expert witness analysis, deposition, and testimony for City of Asheville, in *Jensen v. City of Asheville*, Buncombe County Superior Court, 2009-2010
- Expert witness analysis and testimony for City of Asheville, in *Hall v. City of Asheville*, Buncombe County Superior Court, 2007
- Expert witness analysis and testimony for City of Asheville, in *Arnold v. City of Asheville*, Buncombe County Superior Court, 2005

PUBLIC REDISTRICTING PROJECT EXPERIENCE

- Software operator and presenter, National Conference of State Legislatures Redistricting Seminar: Redistricting Simulation, Providence, RI, 2019

- Hands-on GIS software workshop session leader, Metric Geometry of Gerrymandering Group (MGGG) Conference at the University of Texas, Austin, TX, 2018
- Co-leader of redistricting hackathon, Metric Geometry of Gerrymandering Group (MGGG) Conference at Duke University, Durham, NC, 2017
- Preparation of simulated redistricting plans for Democracy North Carolina's Districting Voter Education Forum, Asheville, NC, 2017
- Hands-on GIS software workshop session assistant, Metric Geometry of Gerrymandering Group (MGGG) Conference at Tufts University, Medford, MA, 2017
- Preparation of redistricting map exhibits used in *Vesilind v. Virginia State Board of Elections* trial, Richmond, VA, 2017
- Redistricting software operator (converting retired jurists' instructions into maps), Duke University and Common Cause NC independent redistricting commission simulation, Raleigh, NC and Winston-Salem, NC, 2016

MEDIA APPEARANCES, OP-EDS, AND CITATIONS

- "With No Supreme Court End to Gerrymandering, Will States Make It More Extreme?" (citation/link of blog article), *New York Times*, June 28, 2019
- "The Supreme Court takes on gerrymandering. A cottage industry wants to prove it's gone too far," *USA Today*, March 26, 2019
- "Gerrymandering: 'Packing' and 'Cracking,' the meat and potatoes of partisan redistricting," *USA Today*, March 25, 2019
- "NC gerrymandering: Turner, McGrady lead reform effort on redistricting" *Asheville Citizen-Times*, February 14, 2019
- "Looking for a Way Forward on Redistricting Reform," *Duke Today*, January 28, 2019
- "Will Asheville try to stop the state from splitting it into districts?" (map citation), *Asheville Citizen-Times*, January 23, 2019
- "Some takeaways from NC's elections," WRAL.com, Nov 7, 2018
- "New Asheville districts are racial gerrymandering, black council members say" *Asheville Citizen-Times*, July 2, 2018
- "Legislature sets up districts for Asheville council, eliminates primaries" (map citation), *Asheville Citizen-Times*, June 27, 2018
- "Van Duyn to back Asheville council districts bill if Senate shifts election dates" (map citation), *Asheville Citizen-Times*, June 21, 2018
- "I Ran the Worst 5K of My Life So I Could Explain Gerrymandering to You," *POLITICO Magazine*, November 15, 2017

- “Event to cover Nov. vote on City Council districts,” *Asheville Citizen-Times*, October 17, 2017
- “Who makes the grade? This week’s editorial report card,” *Asheville Citizen-Times*, June 2, 2017
- “Asheville grows; Charlotte, Raleigh and their suburbs grow faster,” *Asheville Citizen-Times*, May 29, 2017
- “Boundary issues: Where does Asheville end?” (op-ed), *Mountain Xpress*, April 29, 2016
- “For better or worse, Asheville growth inevitable,” *Asheville Citizen-Times*, November 21, 2015
- “St. Lawrence Green no litmus test for voters” (op-ed), *Mountain Xpress*, October 29, 2015

REDISTRICTING AND GIS SOFTWARE EXPERIENCE

- MapInfo (first used 1996)
- Maptitude (first used 1997)
- Esri ArcGIS/ArcInfo/ArcView (first used 2000)
- QGIS (first used 2015)
- Maptitude for Redistricting (first used 2016)
- Dave’s Redistricting App (first used 2016)
- DistrictBuilder (first used 2017)
- Esri Redistricting (first used 2018)
- Districtr (first used 2019)

SELECTED AWARDS (As team member)

- G. Herbert Stout Award for Visionary use of GIS by Local Government, 2009
- International Economic Development Council, Excellence in New Media Initiatives, 2008
- Marvin Collins Outstanding Planning Award for Innovations in Planning Services, Education, and Public Involvement, 2007

ADDITIONAL TRAINING

- Public Data, Public Access, Privacy, and Security: U.S. Law and Policy, Urban and Regional Information Systems Association Certified Workshop, Raleigh, NC, 2015
- An Overview of Open Source GIS Software, Urban and Regional Information Systems Association Certified Workshop, Portland, OR, 2012

- An Introduction to Public Participation GIS: Using GIS to Support Community Decision Making, Urban and Regional Information Systems Association Certified Workshop, Orlando, FL, 2010
- 3-D Geospatial Best Practices and Project Implementation Methods, Urban and Regional Information Systems Association Certified Workshop, Vancouver, BC (Canada), 2006

BOARDS AND COMMISSIONS

- Asheville City Council Appointee to Comprehensive Plan Advisory Committee, 2016-2018

MEMBERSHIPS

- Urban and Regional Information Systems Association (URISA)
- Mountain Regional GIS Alliance (MRGAC)
- American Planning Association (APA)