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' PRETRIAL MEMORANDUM

INTRODUCTION

Partisan gerrymandering is an existential threat to democracy in North Carolina. Republicans in the North Carolina General Assembly have egregiously rigged the state legislative district lines to guarantee that their party will control both the North Carolina House of Representatives and the North Carolina Senate regardless of how the people of North Carolina vote. This attack on representative democracy and North Carolinians' voting rights is wrong. It violates the North Carolina Constitution. And only the courts of this State can bring it to an end.

In 2011, following a national movement by the Republican Party to entrench itself in power through control over redistricting, Legislative Defendants' mapmaker manipulated district boundaries with surgical precision to maximize the political advantage of Republican voters and minimize the representational rights of Democratic voters. And it worked: in the 2012, 2014, and 2016 elections, Republicans won veto-proof super-majorities in both chambers of the General Assembly. Then, in 2017, after federal courts stuck down some of the 2011 districts as illegal racial gerrymanders, Republicans redoubled their efforts to gerrymander the district lines on partisan grounds. Evidence from the mapmaker's own files shows his laser-like focus on drawing new districts in 2017 to maximize the political advantage of Republicans.

And again, it worked. The votes that North Carolinians cast in elections should matter, but Legislative Defendants' mapmaker produced maps where their votes don't matter. Despite the Democratic wave of 2018, in which Democratic candidates won a majority of the statewide vote in both state House and Senate races, Republicans still won a substantial majority of seats in each chamber. Republicans won more seats in each chamber than they would have under a non-partisan map that accounts for the state's political geography. Democrats simply could not overcome the seawall of the Republican gerrymander.

It gets worse. Because North Carolina is one of only a few states in the country where the Governor lacks the power to veto redistricting legislation, the General Assembly alone will control the next round of redistricting after the 2020 census. So as things currently stand, the Republican majorities in the General Assembly elected under the current maps will have free rein to redraw both state legislative and congressional district lines for the next decade. In other words, representatives elected under one gerrymander can enact new gerrymanders to maintain their control of the state legislature and rig elections for ten more years. North Carolina courts, applying the North Carolina Constitution, stand as the only bulwark against the subversion of representative democracy in this state, decade after decade after decade, in perpetuity.

The North Carolina Constitution prohibits partisan gerrymandering. This state's equal protection guarantees provide more robust protection for voting rights than the federal constitution. Specifically, "[i]t is well settled in this State that the right to vote *on equal terms* is a fundamental right." *Stephenson v. Bartlett*, 355 N.C. 354, 378, 562 S.E.2d 377, 393 (N.C. 2002) (emphasis added). There is nothing "equal" about the "terms" on which North Carolinians vote for candidates for the General Assembly under the 2017 Plans. North Carolina's Constitution also commands that "all elections shall be free"—a provision that has no counterpart at all in the federal constitution. Elections to the North Carolina General Assembly are not "free" when the outcomes of not only individual races, but control of both chambers of the General Assembly itself, are virtually predetermined by partisan actors sitting behind a computer. And the North Carolina Constitution's free speech and assembly guarantees prohibit the General Assembly from burdening the speech and associational rights of voters and organizations because the General Assembly disfavors their political views.

This Court should invalidate the 2017 state House and Senate plans ("2017 Plans") and order new, fair, nondiscriminatory maps for the 2020 elections.

FACTS AND EVIDENCE

A.   Fact Witnesses

Plaintiffs plan to introduce testimony from the following fact witnesses. Unless otherwise indicated, Plaintiffs plan to call these witnesses to testify live at trial.

Bob Phillips is the Executive Director of Common Cause North Carolina. He will testify about how the 2017 Plans harm Common Cause and its members. Mr. Phillips also will testify about the process that led to the enactment of the 2017 Plans.

Wayne Goodwin is the chair of the North Carolina Democratic Party. He will testify about how the 2017 Plans harm the North Carolina Democratic Party and its members.

Two individual voter-plaintiffs will testify live about how the 2017 Plans affect and injure them.

The remaining individual voter-plaintiffs who do not testify live will instead testify via affidavits, as agreed by the parties. The affidavits will provide testimony establishing each of these individual voter-plaintiffs' standing to sue and their injuries.

Dan Blue is a Democratic member of the North Carolina Senate, representing Senate District 14. He is also the Senate Minority Leader. Senator Blue will testify about the process that led to the enactment of the 2017 Plans, and about the effect of the 2017 Plans on the composition and activities of the General Assembly.

Graig Meyer is a Democratic member of the North Carolina House, representing House District 50. He served as the head of candidate recruitment for Democratic candidates for the House during the 2018 election cycle. Representative Meyer will testify about the process that

led to the enactment of the 2017 Plans, and about the effect of the 2017 Plans on the composition and activities of the General Assembly.

Jon Matthews is a Vice President at Stroz Friedberg, a computer forensics firm retained by Plaintiffs in this case. Mr. Matthews will testify about the authenticity and proper chain of custody of the specific materials from Dr. Hofeller's files that Plaintiffs will introduce at trial. Mr. Matthews has already submitted an affidavit sufficient to establish the authenticity and proper chain of custody for these materials, but will be available to testify live at trial if needed.

Stephanie Hofeller is the daughter of Dr. Hofeller. Ms. Hofeller will testify about her father's work files that she provided to Plaintiffs in response to a lawful subpoena. The parties have agreed to admit Ms. Hofeller's May 17, 2019 trial-preservation deposition in its entirety.

Blake Esselstyn will testify as a fact witness if needed for authenticity and chain of custody purposes with respect to certain of Dr. Hofeller's Maptitude files. While Plaintiffs believe that Mr. Esselstyn's testimony is unnecessary given other evidence Plaintiffs will present for authenticity and chain of custody, he will be available to testify on these issues if necessary.

B. Expert Witnesses

Plaintiffs plan to call the following expert witnesses to testify live at trial.

Jowei Chen, Ph.D., is an Associate Professor in the Department of Political Science at the University of Michigan, Ann Arbor. Dr. Chen will testify as an expert in, among other things, legislative districting, political geography, and geographic information systems. Dr. Chen will testify that, by using computer simulation programming techniques to produce a large number of nonpartisan districting plans that adhere to traditional districting criteria such as compactness and avoiding splitting municipalities and voting tabulation districts ("VTDs"), he can assess whether an enacted plan is a statistical outlier with respect to its adherence to these traditional criteria and with respect to its partisan makeup. Stated differently, Dr. Chen is able to rigorously assess

whether partisan considerations predominated over, or "subordinated," traditional nonpartisan districting criteria in creating an enacted plan. Applying this methodology to the 2017 Plans, Dr. Chen will testify that the 2017 Plans are extreme statistical outliers in their level of partisan bias favoring Republicans, in their lack of compactness, and in the number of municipalities and VTDs they split. Dr. Chen will testify, among other things, that in the drawing of the 2017 Plans, partisan considerations predominated over traditional nonpartisan districting criteria. Dr. Chen will further testify about the extent to which specific county groupings contain districts that are partisan outliers. He will testify that the 2017 Plans contain districts that are outliers in fifteen specific House county groupings and seven specific Senate county groupings. Dr. Chen will further testify about the extent to which individual Plaintiffs live in districts that are outliers compared to the districts in which those Plaintiffs would live under non-partisan plans.

In addition, Dr. Chen will testify about his analysis of certain files of Dr. Thomas Hofeller, the Legislative Defendants' mapmaker in both 2011 and 2017. Dr. Chen will explain that these files reveal that Dr. Hofeller had substantially completed the 2017 Plans by late June 2017—a month-and-a-half before the "Adopted Criteria" were passed by the Joint Redistricting Committee on August 10, 2017—and that Dr. Hofeller violated the Adopted Criteria by having and viewing racial data on his draft districts. Dr. Chen will also analyze spreadsheets from Dr. Hofeller's files that focused exclusively on partisan considerations while drafting the districts.

Jonathan C. Mattingly, Ph.D., is James B. Duke Professor of Mathematics and Chair of the Department of Mathematics at Duke University in Durham, North Carolina. Dr. Mattingly is also a Professor of Statistical Science at Duke. Dr. Mattingly will testify as an expert in applied mathematics, probability, and statistical science. The approach that Dr. Mattingly will testify

about in this case is the product of a nonpartisan academic research effort that Dr. Mattingly

began at Duke before becoming involved in this lawsuit.

Dr. Mattingly uses a mathematical algorithm to create a representative sample of the

universe of possible North Carolina redistricting plans that respect traditional districting

principles -- and that are comparable to the 2017 Enacted Plans with respect to features like

compactness and county, municipal, and precinct splits. Dr. Mattingly has created

approximately 1.1×10^{108} plans for the North Carolina House and approximately 3.7×10^{93} plans

for the North Carolina Senate. Dr. Mattingly will testify that he has analyzed those nonpartisan

plans and the 2017 Plans using all of the statewide election results available to him since 2008.

He will testify that the 2017 Plans systematically favor the Republican Party and are extreme

partisan outliers in comparison to typical plans that respect North Carolina's political geography.

He will testify that the chance that the 2017 Plans' extreme pro-Republican bias was

unintentional is astronomically small. He will also testify about how the partisan bias in the

2017 Plans protects Republican supermajorities in instances where typical plans would not

produce supermajorities, and protects Republican majorities in instances where typical plans

would produce Democratic majorities.

Christopher A. Cooper, Ph.D., is Professor and Department Head of Political Science and

Public Affairs at Western Carolina University in Cullowhee, North Carolina. Dr. Cooper will

testify as an expert in political science, including on the political geography and political history

of North Carolina. Dr. Cooper will testify about the disconnect between North Carolina's

statewide voting patterns and the electoral outcomes in North Carolina state legislative races

after the 2011 round of redistricting. He will discuss specific state House and Senate districts at

issue in this case and the electoral impact of their boundaries. Dr. Cooper also will testify about

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his analysis of specific county groupings and will explain in detail how the district lines in each relevant county grouping reflect an intentional effort to pack and crack Democratic voters in order to minimize the total number of seats that Democrats win.

Dr. Cooper will also testify about his analysis of certain of Dr. Hofeller's files. He will testify that those files disprove any notion that the Whole County Rule supposedly constrained Dr. Hofeller in using partisan considerations to draw districts lines, or that North Carolina's natural political geography can purportedly explain the partisan composition of districts within certain geographic areas.

Wesley Pegden, Ph.D., is an Associate Professor in the Department of Mathematical Sciences at Carnegie Mellon University. He will testify as an expert in, among other things, probability. Dr. Pegden will testify that, by analyzing how the partisan characteristics of districts change when a series of many small, random changes are made to the existing district lines, he can assess and quantify the extent to which partisan considerations played a role in drawing a redistricting plan. Dr. Pegden will testify that, applying that analysis here, the 2017 Plans made extreme use of partisan considerations. Using a mathematical theorem he developed, Dr. Pegden will testify that the 2017 Plans are more carefully crafted to favor Republicans than nearly *all* of the trillions upon trillions of possible districting plans that comport with the nonpartisan districting criteria adopted by the General Assembly in August 2017. Dr. Pegden will testify that it is essentially mathematically impossible that this unusual feature of the 2017 Plans occurred by chance, without a deliberate effort to draw district boundaries to advantage Republicans.

Dr. Chen, Dr. Mattingly, and Dr. Pegden each will testify that their respective methodologies account for North Carolina's political geography, including purported natural

clustering of Democratic voters, and that their results establish that political geography is not the

cause of the 2017 Plans' extreme pro-Republican bias.

Plaintiffs may also call one additional expert witness, *Lisa Handley, Ph.D.*, solely for

rebuttal.

C. Exhibits

Plaintiffs' Exhibit List is attached hereto as Attachment A. Plaintiffs may introduce

additional exhibits for purposes of cross-examination or in rebuttal.

CLAIMS AND LEGAL STANDARDS

The evidence described above will establish that Plaintiffs have standing, that they have

met all of the elements of each of their claims on the merits, and that they are entitled to

appropriate relief in the form of new, fair, nondiscriminatory maps for the 2020 elections.

A. Standing

As a threshold matter, the evidence will establish that all Plaintiffs have standing. "In

order for a plaintiff to have standing to bring a claim, the plaintiff must establish three elements:

(1) injury in fact—an invasion of a legally protected interest that is (a) concrete and

particularized and (b) actual or imminent, not conjectural or hypothetical; (2) the injury is fairly

traceable to the challenged action of the defendant; and (3) it is likely, as opposed to merely

speculative, that the injury will be redressed by a favorable decision." *Strates Shows, Inc. v.

Amusements of Am., Inc.*, 184 N.C. App. 455, 460, 646 S.E.2d 418, 423 (N.C. Ct. App. 2007)

(quotation marks omitted).

The evidence here will establish that all 37 individual voter-plaintiffs have standing to

challenge the 2017 Plans, both with respect to the particular districts and county clusters in

which they reside and also statewide. The evidence also will establish that both Common Cause

and the North Carolina Democratic Party have associational standing to challenge the 2017 Plans

statewide on behalf of their members because (1) at least one member of each association resides in every state House and Senate district statewide and would have standing to sue in his or her own right, (2) the interests this suit seeks to protect are germane to each association's purpose, and (3) the claims asserted and relief requested do not require the participation of individual members in this lawsuit. *See River Birch Assocs. v. City of Raleigh*, 326 N.C. 100, 130, 388 S.E.2d 538, 555 (N.C. 1990). The evidence also will establish that both Common Cause and the North Carolina Democratic Party have organizational standing to sue on their own behalves. *See Creek Pointe Homeowner's Ass'n, Inc. v. Happ*, 146 N.C. App. 159, 168, 552 S.E.2d 220, 227 (N.C. Ct. App. 2001).

B.   **Claims for Relief on the Merits**

On the merits, the evidence will establish all of the elements of all three counts set forth in Plaintiffs' Amended Complaint.

First, the evidence will establish that the 2017 Plans violate the North Carolina Constitution's Equal Protection Clause. Article I, Section 19 of the North Carolina Constitution provides that "[n]o person shall be denied the equal protection of the laws." This provision provides greater protection for the voting rights of North Carolinians than the equal protection provisions of the U.S. Constitution. *See Stephenson*, 355 N.C. at 377-80 & n.6, 562 S.E.2d at 393-95 & n.6; *Blankenship v. Bartlett*, 363 N.C. 518, 522-28, 681 S.E.2d 759, 763-66 (N.C. 2009). North Carolina's Equal Protection Clause protects "the fundamental right of each North Carolinian to substantially equal voting power." *Stephenson*, 355 N.C. at 379, 562 S.E.2d at 394. "It is well settled in this State that the right to vote on equal terms is a fundamental right." *Stephenson*, 355 N.C. at 378, 562 S.E.2d at 393 (internal quotation marks omitted). It is further well settled that these North Carolina equal protection principles apply with full force in the redistricting context. *See id.*

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To establish a violation of North Carolina's Equal Protective Clause, Plaintiffs will prove that (1) the 2017 Plans were created with an intent to deprive Plaintiffs and other voters who consistently vote for Democratic candidates of substantially equal voting power or of the right to vote on equal terms; and (2) the 2017 Plans have a discriminatory effect on Plaintiffs and other voters who consistently vote for Democratic candidates by actually depriving them of substantially equal voting power or the right to vote on equal terms. *See In re Battle*, 166 N.C. App. 240, 245, 601 S.E.2d 253, 256 (N.C. Ct. App. 2004); *Stephenson*, 355 N.C. at 378, 562 S.E.2d at 393; *Blankenship*, 363 N.C. at 527-28, 681 S.E.2d at 766. Although no further showing is necessary to satisfy the elements of Plaintiffs' equal protection claim, the evidence also will establish that the 2017 Plans substantially disadvantaged Plaintiffs and other voters who consistently vote for Democratic candidates, that discriminating against such voters was Legislative Defendants' predominant intent in crafting the 2017 Plans, and that partisan considerations subordinated traditional nonpartisan districting criteria in the crafting of the 2017 Plans. Once Plaintiffs make out a prima facie case on the elements of discriminatory intent and discriminatory effect, the burden then shifts to Legislative Defendants to establish that the 2017 Plans were narrowly tailored to achieve a compelling government interest. *See Stephenson*, 355 N.C. at 377-78, 562 S.E.2d at 393. Legislative Defendants can show no compelling interest in intentionally discriminating against voters on the basis of their political beliefs.

Second, the evidence will establish that the 2017 Plans violate the North Carolina Constitution's Free Elections Clause. Article I, Section 10 of the North Carolina Constitution provides that "[a]ll elections shall be free." This clause has no federal counterpart. The General Assembly violates the Free Elections Clause when it attempts to predetermine the outcome of elections by drawing maps designed to ensure that the ballots voters cast will not

matter. Plaintiffs will prove that the outcome of elections under the 2017 Plans is virtually

predetermined due to the partisan motivations of those who drew the district lines. An election is

not free when the government puts its thumb on the scale to make it more difficult for voters of a

particular party to elect their preferred candidate. In a free election, votes should make a

difference. *See Clark v. Meyland*, 261 N.C. 140, 142-43, 134 S.E.2d 168, 169-70 (N.C. 1964);

Blankenship, 362 N.C. at 521-22, 681 S.E.2d at 762-63; *Stephenson*, 355 N.C. at 378, 562 S.E.2d

at 393.

It is not just the outcome of individual races for state House and Senate seats that are

predetermined or virtually predetermined, but control of each chamber of the General Assembly

itself. The purpose of the Free Elections Clause, in conjunction with Article I, Section 9

immediately preceding it, is to facilitate North Carolinians' ability to seek a "redress of

grievances and for amending and strengthening the law." John V. Orth & Paul M. Newby, The

North Carolina Constitution 56 (2d ed. 2013). The 2017 Plans substantially undermine this

purpose by guaranteeing that Republicans will control both chambers of the General Assembly,

and ensuring that no matter the party affiliation of their individual representatives, Plaintiffs and

other voters who consistently vote for Democratic candidates will never be able to effectively

seek redress of grievances with the General Assembly or amend the law in accordance with their

preferred policies.

Notably, the Pennsylvania Supreme Court has held that partisan gerrymandering violates

the Pennsylvania Constitution's Free and Equal Elections Clause, *League of Women Voters v.

Commonwealth*, 178 A.3d 737, 814 (Pa. 2018), which, like North Carolina's Free Elections

Clause, "originally derives . . . from the English Declaration of Rights (1689)," John V. Orth

& Paul M. Newby, The North Carolina Constitution 56 (2d ed. 2013).

Third, the evidence will establish that the 2017 Plans violate the North Carolina

Constitution's Freedom of Speech and Freedom of Assembly Clauses. Article I, Section 12 of

the North Carolina Constitution provides that "[t]he people have a right to assemble together to

consult for their common good, to instruct their representatives, and to apply to the General

Assembly for redress of grievances." Article I, Section 14 provides that "[f]reedom of speech

and of the press are two of the great bulwarks of liberty and therefore shall never be restrained."

North Carolina courts have recognized that these provisions may afford broader protection to the

rights of free speech and association than their federal counterparts. *See Evans v. Cowan*, 122

N.C. App. 181, 183-84, 468 S.E.2d 575, 577-78 (N.C. Ct. App.), *aff'd*, 477 S.E.2d 926 (N.C.

1996); *McLaughlin v. Bailey*, 240 N.C. App. 159, 172, 771 S.E.2d 570, 579-80 (N.C. Ct. App.

2015), *aff'd*, 781 S.E.2d 23 (N.C. 2016).

Plaintiffs may establish a violation of these state constitutional provisions, irrespective of

their federal counterparts, under either a discrimination theory or a retaliation theory. To

establish a violation of these provisions under a discrimination theory, Plaintiffs will prove that

(1) Plaintiffs have engaged in protected speech, expression, association, or application for

redress of grievances, or are likely to do so, and (2) the 2017 Plans intentionally discriminate

against or burden Plaintiffs on the basis of their protected speech or conduct. Once Plaintiffs

make out a prima facie case on these elements, the burden then shifts to the Legislative

Defendants to establish that the 2017 Plans were narrowly tailored to achieve a compelling

government interest. *See State v. Petersilie*, 334 N.C. 169, 206, 432 S.E.2d 832, 853-54 (N.C.

1993).

Alternatively, to establish a violation of these provisions under a retaliation theory,

Plaintiffs will prove that (1) Plaintiffs have engaged in protected speech, expression, association,

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or application for redress of grievances, (2) the 2017 Plans take adverse action against Plaintiffs, (3) the 2017 Plans were created with an intent to retaliate against Plaintiffs' protected speech or conduct, and (4) the 2017 Plans would not have taken the adverse action but for that retaliatory intent. *See McLaughlin*, 240 N.C. App. at 172, 771 S.E.2d at 579-80.

C.   Remedy

Finally, the evidence described above will establish that Plaintiffs are entitled to appropriate relief in the form of new, fair, nondiscriminatory maps drawn in compliance with the North Carolina Constitution in time for the 2020 primary and general elections.

In particular, the evidence will establish that Plaintiffs are entitled to the remedy of new maps drawn in the first instance by the Court, with the aid of a special master. While a North Carolina statute purports to afford the General Assembly an opportunity to redraw state legislative maps if the existing ones are struck down, *see* N.C.G.S.A. § 120-2.4(a), that statute cannot trump this Court's obligation to ensure compliance with the North Carolina Constitution. This Court "cannot turn a blind eye on the record of the Legislature" in repeatedly violating the constitutional rights of the State's citizens in drawing districting plans. *Hays v. State*, 936 F. Supp. 360, 372 (W.D. La. 1996). Over and over again this decade, Legislative Defendants have adopted state legislative and congressional plans that discriminate against voters. The federal courts found that the 2011 state House and state Senate plans constituted among the most pervasive racial gerrymanders in American history, and in response to that decision, Legislative Defendants adopted new plans that intentionally discriminate against voters on the basis of partisanship instead. Legislative Defendants did the exact same with respect to the State's congressional districts.

Courts have held that a legislature forfeits any right to have the opportunity to draw remedial plans where it has repeatedly violated the constitutional rights of voters in drawing

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districts. *Id.* "The Legislature has left [this Court] no basis for believing that, given yet another chance, it would produce a constitutional plan." *Id*. And there are particularly strong reasons to not afford Legislative Defendants an opportunity to draw news plan here because the evidence will show that they made multiple false or misleading statements to the federal court presiding over the remedial process that led to the existing plans. The evidence will establish that *only* court-drawn remedial maps will reliably cure the constitutional violations here.

In the alternative, if the Court affords the General Assembly an opportunity to attempt to enact remedial maps in the first instance, the General Assembly should be ordered to conduct the *entire* remedial process in public view, should be ordered not to use past election results or other political data to intentionally dilute the voting power of citizens or groups of citizens on the basis of their partisan preferences, should be ordered not to otherwise intentionally dilute the voting power of citizens or groups of citizens on the basis of their partisan preferences, and should be given no more than two weeks to pass new plans. As the Court is aware, time is of the essence. The window for candidates to file for party primary nominations is currently set to open on December 2, 2019, and primary elections are scheduled to be held on March 3, 2020. *See* N.C.G.S.A. §§ 163A-700(b), 163A-974(b). When Plaintiffs filed this lawsuit on November 13, 2018, N.C.G.S.A. § 120-2.4(a) provided in relevant part that a court may not impose a remedial redistricting plan "unless the court first gives the General Assembly a period of time to remedy any defects identified by the court in its findings of fact and conclusions of law," and "[t]hat period of time shall not be less than two weeks."

On December 27, 2018, however, the General Assembly overrode the Governor's veto and enacted an amendment to that statute. The amendment provides that the General Assembly must have at least two weeks to enact a remedial plan, "provided, however, that if the General

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Assembly is scheduled to convene legislative session within 45 days of the date of the court order[,] that period of time shall be not less than two weeks from the convening of that legislative session." 2018 North Carolina Laws S.L. 2018-146, § 4.7. This amendment purports to extend the period for the General Assembly to enact a remedial plan from 14 days to up to 69 days, depending on the legislative calendar. That amendment cannot apply retroactively to this case, which was filed before the amendment was enacted. In any event, it cannot trump the North Carolina Constitution, which—regardless of the legislative calendar—guarantees the people of this state the right to vote under fair, nondiscriminatory maps for the 2020 elections.

Respectfully submitted this the 8th day of July, 2019

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CERTIFICATE OF SERVICE

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

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This the 8th day of July, 2019.

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EXHIBIT A

PLAINTIFFS' EXHIBIT LIST
Common Cause, et al. v. David Lewis, et al.,

Exhibit #	Description	Bates Number (if applicable)	Objection
1	Expert Report of Jowei Chen, Ph.D.		
2	Jowei Chen, Ph.D. - Curriculum Vitae		
3	County Groupings Used for the 2017 House Plan and All Computer-Simulated House Plans [Chen Report Table 1]		
4	County Groupings Used for the 2017 Senate Plan and All Computer-Simulated Senate Plans [Chen Report Table 2]		
5	The Calculation of District-Level Partisanship Using the 2010-2016 Statewide Election Composite [Chen Report Table 3]		
6	Calculating the Partisanship of Districts Originally Drawn in 2011. Using the 2004-2010 Statewide Election Composite [Chen Report Table 4]		
7	Summary of the Enacted 2017 House Plan and House Simulation Sets 1 and 2 [Chen Report Table 5]		
8	Example of a Computer-Simulated House Map from House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria) [Chen Report Figure 1]		
9	House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Democratic-Favoring Districts in 2017 House Plan Versus 1,000 Simulated Plans (Measured Using 2010-2016 Election Composite) [Chen Report Figure 2]		
10	Number of Democratic Districts Under Alternative Uniform Swings in House Simulation Set 1 Plans [Chen Report Figure U1]		

Exhibit #	Description	Bates Number (if applicable)	Objection
11	Number of Democratic House Districts Measured Using the 2010-2016 Election Composite with a +4.5% Uniform Swing, Corresponding to a 52.42% Statewide Democratic Vote Share (House Simulation Set 1) [Chen Report Figure U2]		
12	Number of Democratic House Districts Measured Using the 2010-2016 Election Composite with a +5% Uniform Swing, Corresponding to a 52.92% Statewide Democratic Vote Share (House Simulation Set 1) [Chen Report Figure U3]		
13	House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Comparison of 2017 House Plan to 1,000 Simulated Plans on Compactness and Mean-Median Difference [Chen Report Figure 3]		
14	House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Comparison of 2017 House Plan Versus 1,000 Simulated Plans on Compactness [Chen Report Figure 4]		
15	House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Split Municipalities in 2017 House Plan Versus 1,000 Simulated Plans [Chen Report Figure 5]		
16	House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Split VTDs in 2017 House Plan Versus 1,000 Simulated Plans [Chen Report Figure 6]		
17	Example of a Computer-Simulated House Map from House Simulation Set 2 (Following Only Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings) [Chen Report Figure 7]		

Exhibit #	Description	Bates Number (if applicable)	Objection
18	House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Democratic-Favoring Districts in 2017 House Plan Versus 1,000 Simulated Plans (Measured Using 2010-2016 Election Composite) [Chen Report Figure 8]		
19	House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Comparison of 2017 House Plan to 1,000 Simulated Plans on Compactness and Mean-Media Difference [Chen Report Figure 9]		
20	House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Comparison of 2017 House Plan to 1,000 Simulated Plans on Compactness [Chen Report Figure 10]		
21	House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Split Municipalities in 2017 House Plan Versus 1,000 Simulated Plans [Chen Report Figure 11]		
22	House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Split VTDs in 2017 House Plan Versus 1,000 Simulated Plans Chen Report Figure 12]		
23	Number of Democratic Districts Under Alternative Uniform Swings in House Simulation Set 2 Plans [Chen Report Figure U4]		
24	Number of Democratic House Districts Measured Using the 2010-2016 Election Composite with 5% Uniform Swing, Corresponding to a 52.92% Statewide Democratic Vote Share [Chen Report Figure U5]		

Exhibit #	Description	Bates Number (if applicable)	Objection
25	Number of Democratic House Districts Measured Using the 2010-2016 Election Composite [Chen Report Figure U6]		
26	Summary of the Enacted 2017 Senate Plan and Senate Simulation Sets 1 and 2 [Chen Report Table 6]		
27	Example of a Computer-Simulated Senate Map From Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria) [Chen Report Figure 13]		
28	Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Democratic-Favoring Districts in 2017 Senate Plan Versus 1,000 Simulated Plans (Measured Using 2010-2016 Election Composite) [Chen Report Figure 14]		
29	Number of Democratic Districts Under Alternative Uniform Swings in Senate Simulation Set 1 Plans [Chen Report Figure U7]		
30	Number of Democratic Senate Districts Measured Using the 2010-2016 Election Composite With a +4% Uniform Swing, Corresponding to a 51.92% Statewide Democratic Vote Share (Senate Simulation Set 1) [Chen Report Figure U8]		
31	Number of Democratic Senate Districts Measured Using the 2010-2016 Election Composite With a +4.5% Uniform Swing, Corresponding to a 52.42% Statewide Democratic Vote Share (Senate Simulation Set 1) [Chen Report Figure U9]		

Exhibit #	Description	Bates Number (if applicable)	Objection
32	Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Comparison of 2017 Senate Plan to 1,000 Simulated Plans on Compactness and Mean-Median Difference [Chen Report Figure 15]		
33	Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Comparison of 2017 Senate Plan Versus 1,000 Simulated Plans on Compactness [Chen Report Figure 16]		
34	Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Split Municipalities in 2017 Senate Plan Versus 1,000 Simulated Plans [Chen Report Figure 17]		
35	Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Split VTDs in 2017 Senate Plan Versus 1,000 Simulated Plans [Chen Report Figure 18]		
36	Example of a Computer-Simulated Senate Map From Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents) [Chen Report Figure 19]		
37	Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents): Democratic-Favoring Districts in Enacted Senate Plan Versus 1,000 Simulated Plans (Measured Using 2010-2016 Election Composite [Chen Report Figure 20]		

Exhibit #	Description	Bates Number (if applicable)	Objection
38	Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents): Comparison of 2017 Senate Plan Versus 1,000 Simulated Plans on Compactness and Mean-Median Difference [Chen Report Figure 21]		
39	Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents): Comparison of Enacted Plan Versus 1,000 Simulated Plans on Compactness [Chen Report Figure 22]		
40	Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents): Split Municipalities in Enacted Plan Versus 1,000 Simulated Plans [Chen Report Figure 23]		
41	Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Protecting Incumbents): Split VTDs in Enacted Plan Versus 1,000 Simulated Plans [Chen Report Figure 24]		
42	Number of Democratic Districts Under Alternative Uniform Swings in Senate Simulation Set 2 Plans [Chen Report Figure U10]		
43	Number of Democratic Senate Districts Measured Using the 2010-2016 Election Composite With a +4% Uniform Swing, Corresponding to a 51.92% Statewide Democratic Vote Share (Senate Simulation Set 2) [Chen Report Figure U11]		
44	Number of Democratic Senate Districts Measured Using the 2010-2016 Election Composite With a +4.5% Uniform Swing, Corresponding to a 52.42% Statewide Democratic Vote Share (Senate Simulation Set 2) [Chen Report Figure U12]		

Exhibit #	Description	Bates Number (if applicable)	Objection
45	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Report Figure 25]		
46	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cabarrus-Davie-Montgomery-Richmond-Rowan-Stanly County Grouping [Chen Report Figure 26]		
47	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Report Figure 27]		
48	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Report Figure 28]		
49	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Report Figure 29]		
50	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Report Figure 30]		
51	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Report Figure 31]		

Exhibit #	Description	Bates Number (if applicable)	Objection
52	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [Chen Report Figure 32]		
53	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Mecklenburg County Grouping [Chen Report Figure 33]		
54	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Wake County Grouping [Chen Report Figure 34]		
55	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance County Grouping [Chen Report Figure 35]		
56	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Anson-Union County Grouping [Chen Report Figure 36]		
57	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Brunswick-New Hanover County Grouping [Chen Report Figure 37]		
58	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Buncombe County Grouping [Chen Report Figure 38]		

Exhibit #	Description	Bates Number (if applicable)	Objection
59	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cleveland-Gaston County Grouping [Chen Report Figure 39]		
60	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Duplin-Onslow County Grouping [Chen Report Figure 40]		
61	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Report Figure 41]		
62	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Wake County Grouping [Chen Report Figure 42]		
63	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Mecklenburg County Grouping [Chen Report Figure 43]		
64	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [Chen Report Figure 44]		
65	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Report Figure 45]		

Exhibit #	Description	Bates Number (if applicable)	Objection
66	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Report Figure 46]		
67	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Report Figure 47]		
68	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Report Figure 48]		
69	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robson County Grouping [Chen Report Figure 49]		
70	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cabarrus-Davis-Montgomery-Richmond-Rowan-Stanly County Grouping [Chen Report Figure 50]		
71	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Duplin-Onslow County Grouping [Chen Report Figure 51]		
72	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cleveland-Gaston County Grouping [Chen Report Figure 52]		
73	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Buncombe County Grouping [Chen Report Figure 53]		

Exhibit #	Description	Bates Number (if applicable)	Objection
74	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Brunswick-New Hanover County Grouping [Chen Report Figure 54]		
75	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Anson-Union County Grouping [Chen Report Figure 55]		
76	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance County Grouping [Chen Report Figure 56]		
77	Number of House Districts With At Least HD-66's Republican Vote Share 54.44% in the Cabarrus-Davie-Montgomery-Richmond-Rowan-Stanly County Grouping [Chen Report Figure 57]		
78	Number of House Districts With At Least HD-83's Republican Vote Share 59.31% in the Cabarrus-Davie-Montgomery-Richmond-Rowan-Stanly County Grouping [Chen Report Figure 58]		
79	Number of House Districts With At Least HD-46's Republican Vote Share 55.56% in the Columbus-Pender-Robeson County Grouping [Chen Report Figure 59]		
80	Number of House Districts With At Least HD-45's Republican Vote Share 58.08% in the Cumberland County Grouping [Chen Report Figure 60]		

Exhibit #	Description	Bates Number (if applicable)	Objection
81	Number of House Districts With At Least HD-75's Republican Vote Share of 58.74% in the Forsyth-Yadkin County Grouping [Chen Report Figure 61]		
82	Number of House Districts With At Least HD-7's Republican Vote Share of 56.75% in the Franklin-Nash County Grouping [Chen Report Figure 62]		
83	Number of House Districts With At Least HD-2's Republican Vote Share of 56.12% in the Granville-Person-Vance-Warren County Grouping [Chen Report Figure 63]		
84	Number of House Districts With At Least HD-59's Republican Vote Share of 59.59% in the Guilford County Grouping [Chen Report Figure 64]		
85	Number of House Districts With At Least HD-12's Republican Vote Share of 51.73% in the Lenoir-Pitt County Grouping [Chen Report Figure 65]		
86	Number of House Districts With At Least HD-104's Republican Vote Share of 57.75% in the Mecklenburg County Grouping [Chen Report Figure 66]		
87	Number of House Districts With At Least HD-40's Republican Vote Share of 54.54% in the Wake County Grouping [Chen Report Figure 67]		
88	Number of House Districts With At Least HD-63's Republican Vote Share of 51.48% in the Alamance County Grouping [Chen Report Figure 68]		

Exhibit #	Description	Bates Number (if applicable)	Objection
89	Number of House Districts With At Least HD-55's Republican Vote Share of 55.02% in the Anson-Union County Grouping [Chen Report Figure 69]		
90	Number of House Districts With At Least HD-19's Republican Vote Share of 56.26% in the Brunswick-New Hanover County Grouping [Chen Report Figure 70]		
91	Number of House Districts With At Least HD-116's Republican Vote Share of 53.52% in the Buncombe County Grouping [Chen Report Figure 71]		
92	Number of House Districts With At Least HD-111's Republican Vote Share of 55.44% in the Cleveland-Gaston County Grouping [Chen Report Figure 72]		
93	Number of House Districts With At Least HD-4's Republican Vote Share of 50.09% in the Duplin-Onslow County Grouping [Chen Report Figure 73]		
94	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Report Figure 74]		
95	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Davie-Forsyth County Grouping [Chen Report Figure 75]		

Exhibit #	Description	Bates Number (if applicable)	Objection
96	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Duplin-Harnett-Johnston-Lee-Nash-Sampson County Grouping [Chen Report Figure 76]		
97	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Wake County Grouping [Chen Report Figure 77]		
98	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Mecklenburg County Grouping [Chen Report Figure 78]		
99	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Buncombe-Henderson-Transylvania County Grouping [Chen Report Figure 79]		
100	Senate Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Bladen-Brunswick-New Hanover-Pender County Grouping [Chen Report Figure 80]		
101	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Report Figure 81]		
102	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Davie-Forsyth County Grouping [Chen Report Figure 82]		

Exhibit #	Description	Bates Number (if applicable)	Objection
103	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Duplin-Harnett-Johnston-Lee-Nash-Sampson County Grouping [Chen Report Figure 83]		
104	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Wake County Grouping [Chen Report Figure 84]		
105	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Mecklenburg County Grouping [Chen Report Figure 85]		
106	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Buncombe-Henderson-Transylvania County Grouping [Chen Report Figure 86]		
107	Senate Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Bladen-Brunswick-New Hanover-Pender County Grouping [Chen Report Figure 87]		
108	Number of Senate Districts With At Least SD-27's Republican Vote Share of 55.38% in the Alamance-Guilford-Randolph County Grouping [Chen Report Figure 88]		
109	Number of Senate Districts With At Least SD-31's Republican Vote Share of 65.41% in the Davie-Forsyth County Grouping [Chen Report Figure 89]		

Exhibit #	Description	Bates Number (if applicable)	Objection
110	Number of Senate Districts With At Least SD-11's Republican Vote Share of 57.3% in the Duplin-Harnett-Johnston-Lee-Nash-Sampson County Grouping [Chen Report Figure 90]		
111	Number of Senate Districts With At Least SD-17's Republican Vote Share of 55.55% in the Franklin-Wake County Grouping [Chen Report Figure 91]		
112	Number of Senate Districts With At Least SD-41's Republican Vote Share of 52.43% in the Mecklenburg County Grouping [Chen Report Figure 92]		
113	Number of Senate Districts With At Least SD-8's Republican Vote Share of 50.11% in the Bladen-Brunswick-New Hanover-Pender County Grouping [Chen Report Figure 93]		
114	Number of Senate Districts With At Least SD-48's Republican Vote Share of 57.21% in the Buncombe-Henderson-Transylvania County Grouping [Chen Report Figure 94]		
115	Plaintiffs: House Simulation Set 1 [Chen Report Figure 95]		
116	Plaintiffs: House Simulation Set 2 [Chen Report Figure 96]		
117	Plaintiffs: Senate Simulation Set 1 [Chen Report Figure 97]		

Exhibit #	Description	Bates Number (if applicable)	Objection
118	Plaintiffs: Senate Simulation Set 2 [Chen Report Figure 98]		
119	Appendix A: House Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Democratic-Favoring Districts in 2017 House Plan Versus 1,000 Simulated Plans (Measured Using 2016 Attorney General Election) [Chen Report Figure A1]		
120	Appendix A: House Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Democratic-Favoring Districts in 2017 House Plan Versus 1,000 Simulated Plans (Measured Using 2016 Attorney General Election) [Chen Report Figure A2]		
121	Appendix A: Senate Simulation Set 1 (Following Only Non-Partisan Redistricting Criteria): Democratic-Favoring Districts in 2017 Senate Plan Versus 1,000 Simulated Plans (Measured Using 2016 Attorney General Election) [Chen Report Figure A3]		
122	Appendix A: Senate Simulation Set 2 (Following Non-Partisan Redistricting Criteria and Avoiding Incumbent Pairings): Democratic-Favoring Districts in 2017 Senate Plan Versus 1,000 Simulated Plans (Measured Using 2016 Attorney General Election) [Chen Report Figure A4]		
123	[CORRECTED] Response Report of Jowei Chen, Ph.D.		

Exhibit #	Description	Bates Number (if applicable)	Objection
124	Mecklenburg County Grouping [Chen Rebuttal Report Figure 1]		
125	Alexander-Alleghany-Rockingham-Stokes-Surry-Wilkes County Grouping [Chen Rebuttal Report Figure 2]		
126	Bladen-Greene-Harnett-Johnston-Lee-Sampson-Wayne County Grouping [Chen Rebuttal Report Figure 3]		
127	Caswell-Orange County Grouping [Chen Rebuttal Report Figure 4]		
128	Chatham-Durham County Grouping [Chen Rebuttal Report Figure 5]		
129	Columbia-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 6]		
130	Duplin-Onslow County Grouping [Chen Rebuttal Report Figure 7]		
131	Forsyth-Yadkin County Grouping [Chen Rebuttal Report Figure 8]		
132	Granville-Person-Vance-Warren County Grouping [Chen Rebuttal Report Figure 9]		
133	Lenoir-Pitt County Grouping [Chen Rebuttal Report Figure 10]		
134	Beaufort-Craven County Grouping [Chen Rebuttal Report Figure 11]		
135	Cabarrus-Davis-Montgomery-Richmond-Rowan-Stanly County Grouping [Chen Rebuttal Report Figure 12]		
136	Cumberland County Grouping [Chen Rebuttal Report Figure 13]		
137	Franklin-Nash County Grouping [Chen Rebuttal Report Figure 14]		
138	Guilford County Grouping [Chen Rebuttal Report Figure 15]		
139	Wake County Grouping [Chen Rebuttal Report Figure 16]		
140	Alamance-Guilford-Randolph County Grouping [Chen Rebuttal Report Figure 17]		

Exhibit #	Description	Bates Number (if applicable)	Objection
141	Alleghany-Ashe-Caswell-Rockingham-Stokes-Surry-Watauga-Wilkes County Grouping [Chen Rebuttal Report Figure 18]		
142	Cumberland-Hoke County Grouping [Chen Rebuttal Report Figure 19]		
143	Davie-Forsyth County Grouping [Chen Rebuttal Report Figure 20]		
144	Duplin-Harnett-Johnston-Lee-Nash-Sampson County Grouping [Chen Rebuttal Report Figure 21]		
145	Durham- Granville-Person County Grouping [Chen Rebuttal Report Figure 22]		
146	Franklin-Wake County Grouping [Chen Rebuttal Report Figure 23]		
147	Mecklenburg County Grouping [Chen Rebuttal Report Figure 24]		
148	Screenshot of Dataview Window For Dr. Hofeller's "NC House J-25003.bak.zip" [Chen Rebuttal Report Figure 25]		
149	Screenshot of Dataview Window For Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan [Chen Rebuttal Report Figure 26]		
150	Screenshot of "Formula" Window and District Labels for Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017) [Chen Rebuttal Report Figure 27]		
151	Screenshot of District Labels Reporting Racial Characteristics of Dr. Hofeller's "NC House J-25003.bak.zip" Draft Plan (August 14, 2017) [Chen Rebuttal Report Figure 28]		
152	Screenshot of Dataview Window for Dr. Hofeller's "NC Senate J-23005.bak.zip" Draft Plan (August 13, 2017) [Chen Rebuttal Report Figure 29]		
153	Dr. Hofeller's "FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS.doc" [Chen Rebuttal Report Figure 30]		

Exhibit #	Description	Bates Number (if applicable)	Objection
154	Screenshot of Dr. Hofeller's Draft Plan File: "NC House Plan June 7.xls" [Chen Rebuttal Report Figure 31]		
155	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (December 6, 2016) [Chen Rebuttal Report Figure 32]		
156	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (December 3, 2016) [Chen Rebuttal Report Figure 33]		
157	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (June 12, 2017) [Chen Rebuttal Report Figure 36]		
158	Dr. Hofeller's Draft Plan File: "NC Senate Minimum Partisan J-2" (June 13, 2017) [Chen Rebuttal Report Figure 39]		
159	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx"(June 14, 2017) [Chen Rebuttal Report Figure 40]		
160	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx"(June 14, 2017) [Chen Rebuttal Report Figure 41]		
161	Dr. Hofeller's Draft Plan File: "NC Senate Minimum-Partisan J-2.xlsx"(June 13, 2017) [Chen Rebuttal Report Figure 42]		
162	Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Members.xlsx"(November 26, 2016) [Chen Rebuttal Report Figure 43]		
163	Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Members J-2.xlsx"(July 13, 2017) [Chen Rebuttal Report Figure 44]		
164	Dr. Hofeller's Draft Plan File: "PPI Indicator Votes for New 2017 Legislative Districts.xlsx" (June 24, 2017) [Chen Rebuttal Report Figure 45]		
165	Dr. Hofeller's Draft Plan File: "House Minimum Renumbered.xls" (December 3, 2016) [Chen Rebuttal Report Figure 45b]		

Exhibit #	Description	Bates Number (if applicable)	Objection
166	Dr. Hofeller's Draft Plan File: "Johnston Senate Switch.xlsx" (December 11, 2016) [Chen Rebuttal Report Figure 46]		
167	Dr. Hofeller's Draft Plan File: "NC Senate CCNC Sample Plan - June 2017.xlsx" (July 8, 2017) [Chen Rebuttal Report Figure 47]		
168	Screenshot (Upper Half) of Dr. Hofeller's Draft Plan File: " NC Senate CCNC PPI" (July 8, 2017) [Chen Rebuttal Report Figure 48a]		
169	Screenshot (Lower Half) of Dr. Hofeller's Draft Plan File: " NC Senate CCNC PPI" (July 8, 2017) [Chen Rebuttal Report Figure 48b]		
170	Dr. Hofeller's Draft Plan File: "NC House CCNC Sample Plan - June 2017.xlsx" (July 5, 2017) [Chen Rebuttal Report Figure 49]		
171	African American Population of 2017 House Plan Districts [Chen Rebuttal Report Table 3]		
172	African American Population of 2017 Senate Plan Districts [Chen Rebuttal Report Table 4]		
173	House Computer-Simulated Districts Achieving Dr. Lewis' Estimated Black CVAP Thresholds [Chen Rebuttal Report Table 5]		
174	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 101]		
175	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 102]		

Exhibit #	Description	Bates Number (if applicable)	Objection
176	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 103]		
177	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 104]		
178	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 105]		
179	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Rebuttal Report Figure 106]		
180	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Rebuttal Report Figure 107]		
181	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 108]		
182	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 109]		
183	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Rebuttal Report Figure 110]		
184	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Rebuttal Report Figure 111]		

Exhibit #	Description	Bates Number (if applicable)	Objection
185	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 112]		
186	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 113]		
187	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 114]		
188	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 115]		
189	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 116]		
190	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 117]		
191	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 118]		
192	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [Chen Rebuttal Report Figure 119]		
193	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [Chen Rebuttal Report Figure 120]		

Exhibit #	Description	Bates Number (if applicable)	Objection
194	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 123]		
195	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 124]		
196	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 125]		
197	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 126]		
198	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Cumberland County Grouping [Chen Rebuttal Report Figure 127]		
199	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Rebuttal Report Figure 128]		
200	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Forsyth-Yadkin County Grouping [Chen Rebuttal Report Figure 129]		
201	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 130]		
202	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 131]		

Exhibit #	Description	Bates Number (if applicable)	Objection
203	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Rebuttal Report Figure 132]		
204	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Granville-Person-Vance-Warren County Grouping [Chen Rebuttal Report Figure 133]		
205	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 134]		
206	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 135]		
207	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 136]		
208	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 137]		

Exhibit #	Description	Bates Number (if applicable)	Objection
209	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 138]		
210	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 139]		
211	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Guilford County Grouping [Chen Rebuttal Report Figure 140]		
212	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [Chen Rebuttal Report Figure 141		
213	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Lenoir-Pitt County Grouping [[Chen Rebuttal Report Figure 142]		
214	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Rebuttal Report Figure 145]		
215	House Simulation Set 1: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Rebuttal Report Figure 146]		

Exhibit #	Description	Bates Number (if applicable)	Objection
216	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Rebuttal Report Figure 147]		
217	House Simulation Set 2: Democratic Vote Share of the Enacted and Computer-Simulated Districts Within the Alamance-Guilford-Randolph County Grouping [Chen Rebuttal Report Figure 148]		
218	Senate Computer-Simulated Districts Achieving Dr. Lewis' Estimated Black CVAP Thresholds [Chen Rebuttal Report Table 6]		
219	Comparison of 2017 House Plan and House Simulation Set 1 and Set 2 On Number of Districts with Dr. Lewis' Black CVAP thresholds in Individual Counties [Chen Rebuttal Report Table 7]		
220	Comparison of 2017 Senate Plan and Senate Simulation Set 1 and Set 2 On Number of Districts with Dr. Lewis' Black CVAP thresholds in Individual Counties [Chen Rebuttal Report Table 8]		
221	10,000 Computer-Simulated House Plans for the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 149]		
222	The Computer-Simulated House Plan for the Franklin-Nash County Grouping [Chen Rebuttal Report Figure 150]		
223	Senate District Boundaries for the Davie-Forsyth County Grouping With the Highest Possible Black Voting Age Population [Chen Rebuttal Report Figure 151]		
224	House Simulation Set 1: Black CVAP of the Enacted Computer-Simulated Districts Within the Alamance County Grouping [Chen Rebuttal Report Figure 152]		

Exhibit #	Description	Bates Number (if applicable)	Objection
225	House Simulation Set 1: Black CVAP of the Enacted Computer-Simulated Districts Within the Anson-Union County Grouping [Chen Rebuttal Report Figure 153]		
226	House Simulation Set 1: Black CVAP of the Enacted Computer-Simulated Districts Within the Cleveland-Gaston County Grouping [Chen Rebuttal Report Figure 154]		
227	House Simulation Set 1: Black CVAP of the Enacted Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 155]		
228	House Simulation Set 1: Black CVAP of the Enacted Computer-Simulated Districts Within the Duplin-Onslow County Grouping [Chen Rebuttal Report Figure 156]		
229	House Simulation Set 2: Black CVAP of the Enacted Computer-Simulated Districts Within the Alamance County Grouping [Chen Rebuttal Report Figure 157]		
230	House Simulation Set 2: Black CVAP of the Enacted Computer-Simulated Districts Within the Anson-Union County Grouping [Chen Rebuttal Report Figure 158]		
231	House Simulation Set 2: Black CVAP of the Enacted Computer-Simulated Districts Within the Cleveland-Gaston County Grouping [Chen Rebuttal Report Figure 159]		
232	House Simulation Set 2: Black CVAP of the Enacted Computer-Simulated Districts Within the Columbus-Pender-Robeson County Grouping [Chen Rebuttal Report Figure 160]		
233	House Simulation Set 2: Black CVAP of the Enacted Computer-Simulated Districts Within the Duplin-Onslow County Grouping [Chen Rebuttal Report Figure 161]		

Exhibit #	Description	Bates Number (if applicable)	Objection
234	Actual Distribution of Democratic-Favoring Districts Across 1,000 Simulated Plans in House Simulation Set 1 vs. Binomial Distribution Created by Dr. Thornton [Chen Rebuttal Report Figure 50]		
235	Actual Distribution of Democratic-Favoring Districts Across 1,000 Simulated Plans in House Simulation Set 2 vs. Binomial Distribution Created by Dr. Thornton [Chen Rebuttal Report Figure 51]		
236	Actual Distribution of Democratic-Favoring Districts Across 1,000 Simulated Plans in Senate Simulation Set 1 vs. Binomial Distribution Created by Dr. Thornton [Chen Rebuttal Report Figure 52]		
237	Actual Distribution of Democratic-Favoring Districts Across 1,000 Simulated Plans in Senate Simulation Set 2 vs. Binomial Distribution Created by Dr. Thornton [Chen Rebuttal Report Figure 53]		
238	Plaintiffs: House Simulation Set 1 [Chen Rebuttal Report Figure 54]		
239	Plaintiffs: House Simulation Set 2 [Chen Rebuttal Report Figure 55]		
240	Dr. Hofeller's Draft Plan File: "NC House Plan June7.xls"		
241	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (December 6, 2016)		
242	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members.xlsx" (December 3, 2016)		
243	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members D.xlsx" (June 12, 2017)		
244	Dr. Hofeller's Draft Plan File: "NC Senate Minimum Partisan J-2" (June 13, 2017)		
245	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx" (June 14, 2017)		
246	Dr. Hofeller's Draft Plan File: "House Minimum-Partisan-Members J-2.xlsx" (June 14, 2017)		

Exhibit #	Description	Bates Number (if applicable)	Objection
247	Dr. Hofeller's Draft Plan File: "NC Senate Minimum-Partisan J-2.xlsx" (June 13, 2017)		
248	Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Members.xlsx" (November 26,2016)		
249	Dr. Hofeller's Draft Plan File: "Senate Minimum-Partisan-Member J-2.xlsx" (June 13, 2017)		
250	Dr. Hofeller's Draft Plan File: "House Minimum Renumbered.xls" (December 3, 2016)		
251	Dr. Hofeller's Draft Plan File: "NC Senate CCNC Sample Plan - June 2017.xlsx" (July 8, 2017)		
252	Dr. Hofeller's Draft Plan File: "NC House CCNC Sample Plan - June 2017.xlsx" (July 5, 2017)		
253	Expert Report of Christopher Cooper		
254	Christopher Cooper- Curriculum Vitae		
255	NC Rank in Presidential Vote Share Among 50 States [Cooper Report Figure 1]		
256	NC Council of State Electoral Results 2004-2016 [Cooper Report Figure 2]		
257	Percent of Republican Two-Party Vote Share in NCGA Elections 2012-2018 [Cooper Report Figure 3]		
258	2016 Citizen Political Ideology by State [Cooper Report Figure 4]		
259	Percentage of Seats Held by Democrats in the NCGA 2001-2018 [Cooper Report Figure 5]		
260	Average Member Ideology in the NCGA 2000-2016 [Cooper Report Figure 6]		
261	2016 State Legislative Ideology by State [Cooper Report Figure 7]		
262	NC State Senate Election Margins 2018 [Cooper Report Figure 8]		

Exhibit #	Description	Bates Number (if applicable)	Objection
263	NC State House Election Margins 2018 [Cooper Report Figure 9]		
264	Percent of Democratic Votes and Seats in the NC General Assembly 2012-2018 [Cooper Report Table 1]		
265	Distribution of Senate CPI Scores [Cooper Report Figure 10]		
266	Distribution of House CPI Scores [Cooper Report Figure 11]		
267	NCFEF Senate Ratings [Cooper Report Figure 12]		
268	NCFEF House Ratings [Cooper Report Figure 13]		
269	NC Senate Distribution of Civitas Action Scores 2018 [Cooper Report Figure 14]		
270	NC House Distribution of Civitas Action Scores 2018 [Cooper Report Figure 15]		
271	Legend for Area Maps [Cooper Report Map 1]		
272	Senate Districts 8 and 9 [Cooper Report Map 2]		
273	Wilmington Notch [Cooper Report Map 3]		
274	Senate Districts 10, 11 and 12 [Cooper Report Map 4]		
275	Senate District 11 Country Clubs [Cooper Report Map 5]		
276	Senate Districts 14, 15, 16, 17, and 18 [Cooper Report Map 6]		
277	Municipalities in Senate Districts 14, 15, 16, 17, and 18 [Cooper Report Map 7]		
278	Portions of Raleigh City Limits in Senate Districts 14, 15, 16, 17 and 18 [Cooper Report Map 8]		
279	Lynn Road Traversal in Senate Districts 14, 15, 16, and 18 [Cooper Report Map 9]		
280	Country Clubs in Senate Districts 14, 15, 16, and 18 [Cooper Report Map 10]		

Exhibit #	Description	Bates Number (if applicable)	Objection
281	Senate Districts 24, 26, 27, and 28 [Cooper Report Map 11]		
282	Senate Districts 31 and 32 [Cooper Report Map 12]		
283	Portions of Winston-Salem City Limits in Senate Districts 31 and 32 [Cooper Report Map 13]		
284	Peace Haven Road Traversal in Senate Districts 31 and 32 [Cooper Report Map 14]		
285	Senate Districts 37, 38, 39, 40, and 41 [Cooper Report Map 15]		
286	Portions of Charlotte City Limits in Senate Districts 37, 38, 39, 40, and 41 [Cooper Report Map 16]		
287	Arrowood Quarry and Senate Districts 37 and 41 [Cooper Report Map 17]		
288	Senate Districts 48 and 49 [Cooper Report Map 18]		
289	House Districts 2 and 32 [Cooper Report Map 19]		
290	Municipalities in House Districts 2 and 32 [Cooper Report Map 20]		
291	House Districts 4, 14, and 15 [Cooper Report Map 21]		
292	Municipalities in House Districts 4, 14, and 15 [Cooper Report Map 22]		
293	House Districts 7 and 25 [Cooper Report Map 23]		
294	House Districts 8, 9, and 12 [Cooper Report Map 24]		
295	Municipalities in House Districts 8, 9, and 12 [Cooper Report Map 25]		
296	ECU Bisection in House Districts 8 and 9 [Cooper Report Map 26]		
297	House Districts 11, 33, 34, 35, 36, 37, 38, 39, 40, 41, and 49 [Cooper Report Map 27]		

Exhibit #	Description	Bates Number (if applicable)	Objection
298	Municipalities in House Districts 11, 33, 34, 35, 36, 37, 38, 39, 40, 41, and 49 [Cooper Report Map 28]		
299	House Districts Representing Raleigh and Percentage of District Area in City Limits [Cooper Report Map 29]		
300	NCSU Campus Divisions in House Districts 11, 33, 34, and 49 [Cooper Report Map 30]		
301	House Districts 16, 46, and 47 [Cooper Report Map 31]		
302	House Districts 17, 18, 19, and 20 [Cooper Report Map 32]		
303	Portions of Wilmington City Limits in House Districts 18, 19, and 20 [Cooper Report Map 33]		
304	UNC Wilmington Divisions in House Districts 18, 19, and 20 [Cooper Report Map 34]		
305	House Districts 42, 43, 44, and 45 [Cooper Report Map 35]		
306	Municipalities in House Districts 42, 43, 44, and 45 [Cooper Report Map 36]		
307	House Districts 55, 68, and 69 [Cooper Report Map 37]		
308	Municipalities in House Districts 55, 68, and 69 [Cooper Report Map 38]		
309	US Hwy 74 Traversal in House Districts 55, 68, and 69 [Cooper Report Map 39]		
310	House Districts 58, 59, and 60 [Cooper Report Map 40]		
311	House Districts 63 and 64 [Cooper Report Map 41]		
312	Municipalities in House Districts 63 and 64 [Cooper Report Map 42]		
313	US Hwy 70 Traversal in House Districts 63 and 64 [Cooper Report Map 43]		
314	House Districts 66, 67, 76, 77, 82, and 83 [Cooper Report Map 44]		

Exhibit #	Description	Bates Number (if applicable)	Objection
315	Municipalities in House Districts 66, 67, 76, 77, 82, and 83 [Cooper Report Map 45]		
316	House Districts 71, 72, 73, 74, and 75 [Cooper Report Map 46]		
317	Municipalities in House Districts 71, 72, 73, 74, and 75 [Cooper Report Map 47]		
318	Portions of Winston-Salem City Limits in House Districts 71, 72, 73, 74, and 75 [Cooper Report Map 48]		
319	House Districts 88, 92, 98, 99, 100, 101, 102, 103, 104, 105, 106, and 107 [Cooper Report Map 49]		
320	Portions of Charlotte City Limits in House Districts 88, 92, 99, 100, 101, 102, 103, 104, 105, 106, and 107 [Cooper Report Map 50]		
321	Precincts in House Districts 88, 92, 98, 99, 100, 101, 102, 103, 104, 105, 106, and 107 [Cooper Report Map 51]		
322	Civitas and NCFEF Ratings for House Districts 88, 92, 98, 99, 100, 101, 102, 103, 104, 105, 106 and 107 [Cooper Report Table 2]		
323	House Districts 108, 109, 110, and 111 [Cooper Report Map 52]		
324	Gastonia Division in House Districts 108, 109, and 110 [Cooper Report Map 53]		
325	Municipalities in House Districts 108, 109, 110, and 111 [Cooper Report Map 54]		
326	House Districts 114, 115, and 116 [Cooper Report Map 55]		

Exhibit #	Description	Bates Number (if applicable)	Objection
327	Municipalities in House Districts 114, 115, and 116 [Cooper Report Map 56]		
328	Warren Wilson College Bisection in House Districts 114 and 115 [Cooper Report Map 57]		
329	Expert Response Report of Christopher Cooper		
330	Partisan Formula Field for 2017 NC Senate Redistricting from Dr. Hofeller's Hard Drive [Cooper Rebuttal Report Figure 1]		
331	Example of NC Senate Partisan Targeting from Dr. Hofeller's Hard Drive [Cooper Rebuttal Report Figure 2]		
332	Partisan Targeting in Senate Districts 10, 11, and 12 [Cooper Rebuttal Report Figure 3]		
333	Partisan Targeting in Senate Districts 14, 15, 16, 17, and 18 [Cooper Rebuttal Report Figure 4]		
334	Partisan Targeting in Senate Districts 24, 26, 27, and 28 [Cooper Rebuttal Report Figure 5]		
335	Partisan Targeting in Senate Districts 31 and 32 [Cooper Rebuttal Report Figure 6]		
336	Partisan Targeting in Senate Districts 37, 38, 39, 40, and 41 [Cooper Rebuttal Report Figure 7]		
337	Partisan Formula Field for 2017 House Redistricting from Dr. Hofeller's Hard Drive [Cooper Rebuttal Report Figure 8]		
338	Partisan Targeting in House Districts 2 and 32 [Cooper Rebuttal Report Figure 9]		
339	Partisan Targeting in House Districts 4, 14, and 15 [Cooper Rebuttal Report Figure 10]		
340	Partisan Targeting in House Districts 8, 9, and 12 [Cooper Rebuttal Report Figure 11]		
341	Partisan Targeting in House Districts 11, 33, 34, 35, 36, 37, 38, 39, 40, 41, and 49 [Cooper Rebuttal Report Figure 12]		
342	Partisan Targeting in House Districts 16, 46, and 47 [Cooper Rebuttal Report Figure 13]		

Exhibit #	Description	Bates Number (if applicable)	Objection
343	Partisan Targeting in House Districts 42, 43, 44, and 45 [Cooper Rebuttal Report Figure 14]		
344	Partisan Targeting in House Districts 58, 59, and 60 [Cooper Rebuttal Report Figure 15]		
345	Partisan Targeting in House Districts 71, 72 ,73, 74, and 75 [Cooper Rebuttal Report Figure 16]		
346	Partisan Targeting in House Districts 88, 92, 98, 99, 101, 102, 103, 104, 105, 106, and 107 [Cooper Rebuttal Report Figure 17]		
347	Partisan Formula Field for 2011 NC Senate Redistricting from Dr. Hofeller's Hard Drive [Cooper Rebuttal Report Figure 18]		
348	Partisan Targeting in Senate Districts 8 and 9 [Cooper Rebuttal Report Figure 19]		
349	Partisan Targeting in Senate Districts 48 and 49 [Cooper Rebuttal Report Figure 20]		
350	Partisan Formula Field for July 2011 House Redistricting [Cooper Rebuttal Report Figure 21]		
351	Partisan Targeting in House Districts 17, 18, 19, and 20 [Cooper Rebuttal Report Figure 23]		
352	Partisan Formula Field for the June 2011 House Maps [Cooper Rebuttal Report Figure 24]		
353	Partisan Targeting in House Districts 55, 68, and 69 [Cooper Rebuttal Report Figure 25]		
354	Partisan Targeting in House Districts 63 and 64 [Cooper Rebuttal Report Figure 26]		
355	Partisan Targeting in House Districts 108, 109, 110 and 111 [Cooper Rebuttal Report Figure 27]		
356	Partisan Targeting in House Districts 114, 115, and 116 [Cooper Rebuttal Report Figure 28]		
357	Applying Lewis' Three Assumptions to the 2018 NC Senate Elections [Cooper Rebuttal Report Table 1]		

Exhibit #	Description	Bates Number (if applicable)	Objection
358	Applying Lewis' Three Assumptions to the 2018 NC House Elections [Cooper Rebuttal Report Table 2]		
359	Expert Report of Jonathan Mattingly		
360	Jonathan Mattingly- Curriculum Vitae		
361	Chance that a certain number of Democrats are elected to the North Carolina Senate using the partisan vote counts from the 2008 Lieutenant Governor. [Mattingly Report Figure 1]		
362	Range of Democratic seats won in the ensemble of plans [Mattingly Report Figure 2]		
363	Median number of elected Democrats over the plans in the Senate ensemble for each considered election. [Mattingly Report Figure 3]		
364	Range of the 15th least Democratic district to the 35th least democratic district. [Mattingly Report Figure 4]		
365	Range of possible Democratic seats won in the ensemble to plans. [Mattingly Report Figure 5]		
366	Median number of elected Democrats over the plans in the House ensemble for each considered election. [Mattingly Report Figure 6]		
367	Typical range of the 40th least Democratic district to the 80th least democratic district (Mattingly Report Figure 7)		
368	Collection of histograms in the Senate and House [Mattingly Report Figure 8]		

Exhibit #	Description	Bates Number (if applicable)	Objection
369	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Mecklenburg Cluster (Senate) [Mattingly Report Figure 9]		
370	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Mecklenburg Cluster- Senate] [Mattingly Report Figure 10]		
371	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Wake-Franklin Cluster (Senate) [Mattingly Report Figure 11]		
372	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Wake/Franklin Cluster- Senate] [Mattingly Report Figure 12]		
373	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Davie-Forsyth Cluster (Senate) [Mattingly Report Figure 13]		
374	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Davie-Forsyth Cluster -Senate] [Mattingly Report Figure 14]		
375	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Bladen-Brunswick-Pender-New Hanover Cluster (Senate) [Mattingly Report Figure 15]		

Exhibit #	Description	Bates Number (if applicable)	Objection
376	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Bladen-Brunswick-Pender- New Hanover Cluster- Senate] [Mattingly Report Figure 16]		
377	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Buncombe-Transylvania-Henderson Cluster (Senate) [Mattingly Report Figure 17]		
378	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Buncombe-Transylvania-Henderson Cluster- Senate] [Mattingly Report Figure 18]		
379	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Guilford-Alamance-Randolph Cluster (Senate) [Mattingly Report Figure 19]		
380	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Guilford-Alamance-Randolph Cluster- Senate] [Mattingly Report Figure 20		
381	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Lee-Sampson-Harnett-Duplin-Johnston-Nash Cluster (Senate) [Mattingly Report Figure 21]		
382	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Lee-Sampson-Harnett-Duplin-Johnston-Nash Senate] [Mattingly Report Figure 22]		

Exhibit #	Description	Bates Number (if applicable)	Objection
383	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Alamance Cluster (House) [Mattingly Report Figure 23]		
384	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Alamance Cluster- House] [Mattingly Report Figure 24]		
385	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Buncombe Cluster (House) [Mattingly Report Figure 25]		
386	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Buncombe Cluster- House] [Mattingly Report Figure 26]		
387	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Columbia-Pender-Robeson Cluster (House) [Mattingly Report Figure 27]		
388	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Columbus-Pender-Robeson Cluster - House] [Mattingly Report Figure 28]		
389	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Cumberland Cluster (House) [Mattingly Report Figure 29]		
390	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Cumberland Cluster - House] [Mattingly Report Figure 30]		
391	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Davie-Montgomery-Richmond-Cabarrus-Rowan-Stanly Cluster (House) (Mattingly Report Figure 31)		

Exhibit #	Description	Bates Number (if applicable)	Objection
392	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Davie-Montgomery-Richmond-Cabarrus-Rowan-Stanly Cluster - House] [Mattingly Report Figure 32]		
393	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Duplin-Onslow Cluster (House) [Mattingly Report Figure 33]		
394	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Duplin-Onslow Cluster - House] [Mattingly Report Figure 34]		
395	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Gaston-Cleveland Cluster (House) [Mattingly Report Figure 35]		
396	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Gaston-Cleveland Cluster - House] [Mattingly Report Figure 36]		
397	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Guilford Cluster (House) [Mattingly Report Figure 37]		
398	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Guilford Cluster - House] [Mattingly Report Figure 38]		
399	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Mecklenburg Cluster (House) [Mattingly Report Figure 39]		
400	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Guilford Cluster - House] [Mattingly Report Figure 40]		

Exhibit #	Description	Bates Number (if applicable)	Objection
401	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Nash-Franklin Cluster (House) [Mattingly Report Figure 41]		
402	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Nash-Franklin Cluster- House] [Mattingly Report Figure 42]		
403	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: New Haven-Brunswick Cluster (House) [Mattingly Report Figure 43]		
404	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [New Haven-Brunswick Cluster - House] [Mattingly Report Figure 44]		
405	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Person-Vance-Granville-Warren Cluster (House) [Mattingly Report Figure 45]		
406	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Person-Vance-Granville-Warren Cluster - House] [Mattingly Report Figure 46]		
407	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Pitt-Lenoir Cluster (House) [Mattingly Report Figure 47]		
408	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Pitt-Lenoir Cluster - House] [Mattingly Report Figure 48]		
409	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Union-Anson Cluster (House) [Mattingly Report Figure 49]		

Exhibit #	Description	Bates Number (if applicable)	Objection
410	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Union-Anson Cluster - House] [Mattingly Report Figure 50]		
411	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Wake Cluster (House) [Mattingly Report Figure 51]		
412	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Wake Cluster - House] [Mattingly Report Figure 52]		
413	Enacted districting plan, colored by county, municipalities and averaged Democratic vote fractions: Yadkin-Forsyth Cluster (House) [Mattingly Report Figure 53]		
414	Districts in each plan of the ensemble ordered from least to most Democratic for a given election [Yadkin-Forsyth Cluster - House] [Mattingly Report Figure 54]		
415	Range of expected partisan results in the enacted plan and the ensemble for the North Carolina Senate [Mattingly Report Table 1]		
416	Range of expected partisan results in the enacted plan and the ensemble for the North Carolina House [Mattingly Report Table 2]		
417	Percent chance of electing a given number of Democrats for a given election in the North Carolina Senate. [Mattingly Report Table 3]		
418	Percent chance of electing a given number of Democrats for a given election in the North Carolina House. [Mattingly Report Table 4]		
419	List of municipalities in a given plan [Mattingly Report Table 5]		
420	Sampling parameters for the Senate clusters [Mattingly Report Table 6]		

Exhibit #	Description	Bates Number (if applicable)	Objection
421	Sampling parameters for the House clusters [Mattingly Report Table 7]		
422	The districts in each plan of the ensemble ordered from least to most compact -[Mecklenburg Cluster (Senate)] [Mattingly Report Figure 55]		
423	Comparison of municipal divisions of the enacted plan with the ensemble [Mecklenburg Cluster (Senate)] [Mattingly Report Figure 56]		
424	The districts in each plan of the ensemble ordered from least to most compact [Wake-Franklin Cluster (Senate)] [Mattingly Report Figure 57]		
425	Comparison of municipal divisions of the enacted plan with the ensemble [Wake-Franklin Cluster (Senate)] [Mattingly Report Figure 58]		
426	The districts in each plan of the ensemble ordered from least to most compact [Davie-Forsyth Cluster (Senate)] [Mattingly Report Figure 59]		
427	Comparison of municipal divisions of the enacted plan with the ensemble [Davie-Forsyth Cluster (Senate)] [Mattingly Report Figure 60]		
428	The districts in each plan of the ensemble ordered from least to most compact [Bladen-Brunswick-Pender-New Hanover Cluster (Senate)] (Mattingly Report Figure 61)		
429	Comparison of municipal divisions of the enacted plan with the ensemble [Bladen-Brunswick-Pender-New Hanover Cluster (Senate)] [Mattingly Report Figure 62]		
430	The districts in each plan of the ensemble ordered from least to most compact [Buncombe-Transylvania-Henderson Cluster (Senate)] [Mattingly Report Figure 63]		

Exhibit #	Description	Bates Number (if applicable)	Objection
431	Comparison of municipal divisions of the enacted plan with the ensemble [Buncombe-Transylvania-Henderson Cluster (Senate)] [Mattingly Report Figure 64]		
432	The districts in each plan of the ensemble ordered from least to most compact [Guilford-Alamance-Randolph Cluster (Senate)] [Mattingly Report Figure 65]		
433	Comparison of municipal divisions of the enacted plan with the ensemble [Guilford-Alamance-Randolph Cluster (Senate)] [Mattingly Report Figure 66]		
434	The districts in each plan of the ensemble ordered from least to most compact [Lee-Sampson-Harnett-Duplin-Johnston-Nash Cluster (Senate)] [Mattingly Report Figure 67]		
435	Comparison of municipal divisions of the enacted plan with the ensemble [Lee-Sampson-Harnett-Duplin-Johnston-Nash Cluster (Senate)] [Mattingly Report Figure 68]		
436	The districts in each plan of the ensemble ordered from least to most compact [Alamance Cluster (House)] [Mattingly Report Figure 69]		
437	Comparison of municipal divisions of the enacted plan with the ensemble [Alamance Cluster House)] [Mattingly Report Figure 70]		
438	The districts in each plan of the ensemble ordered from least to most compact [Buncombe Cluster (House)] [Mattingly Report Figure 71]		
439	Comparison of municipal divisions of the enacted plan with the ensemble [Buncombe Cluster House)] [Mattingly Report Figure 72]		

Exhibit #	Description	Bates Number (if applicable)	Objection
440	The districts in each plan of the ensemble ordered from least to most compact [Columbus-Pender-Robeson Cluster (House)] [Mattingly Report Figure 73]		
441	Comparison of municipal divisions of the enacted plan with the ensemble [Columbus-Pender-Robeson Cluster House)] [Mattingly Report Figure 74]		
442	The districts in each plan of the ensemble ordered from least to most compact [Cumberland Cluster (House)] [Mattingly Report Figure 75]		
443	Comparison of municipal divisions of the enacted plan with the ensemble [Cumberland Cluster House)] [Mattingly Report Figure 76]		
444	The districts in each plan of the ensemble ordered from least to most compact [Davie-Montgomery-Richmond-Cabarrus-Rowan-Stanly Cluster (House)] [Mattingly Report Figure 77]		
445	Comparison of municipal divisions of the enacted plan with the ensemble [Davie-Montgomery-Richmond-Cabarrus-Rowan-Stanly Cluster House)] [Mattingly Report Figure 78]		
446	The districts in each plan of the ensemble ordered from least to most compact [Duplin-Onslow Cluster (House)] [Mattingly Report Figure 79]		
447	Comparison of municipal divisions of the enacted plan with the ensemble [Duplin-Onslow Cluster House)] [Mattingly Report Figure 80]		
448	The districts in each plan of the ensemble ordered from least to most compact [Gastow-Cleveland Cluster (House)] [Mattingly Report Figure 81]		

Exhibit #	Description	Bates Number (if applicable)	Objection
449	Comparison of municipal divisions of the enacted plan with the ensemble [Gastow-Cleveland Cluster House)] [Mattingly Report Figure 82]		
450	The districts in each plan of the ensemble ordered from least to most compact [Guilford Cluster (House)] [Mattingly Report Figure 83]		
451	Comparison of municipal divisions of the enacted plan with the ensemble [Guilford Cluster House)] [Mattingly Report Figure 84]		
452	The districts in each plan of the ensemble ordered from least to most compact [Mecklenburg Cluster (House)] [Mattingly Report Figure 85]		
453	Comparison of municipal divisions of the enacted plan with the ensemble [Mecklenburg Cluster House)] [Mattingly Report Figure 86]		
454	The districts in each plan of the ensemble ordered from least to most compact [Nash-Franklin Cluster (House)] [Mattingly Report Figure 87]		
455	Comparison of municipal divisions of the enacted plan with the ensemble [Nash-Franklin Cluster House)] [Mattingly Report Figure 88]		
456	The districts in each plan of the ensemble ordered from least to most compact [New Hanover-Brunswick Cluster (House)] [Mattingly Report Figure 89]		
457	Comparison of municipal divisions of the enacted plan with the ensemble [New Hanover-Brunswick Cluster House)] [Mattingly Report Figure 90]		

Exhibit #	Description	Bates Number (if applicable)	Objection
458	The districts in each plan of the ensemble ordered from least to most compact [Person-Vance-Granville-Warren Cluster (House)] [Mattingly Report Figure 91]		
459	Comparison of municipal divisions of the enacted plan with the ensemble [[Person-Vance-Granville-Warren Cluster House)] [Mattingly Report Figure 92]		
460	The districts in each plan of the ensemble ordered from least to most compact [Pitt-Lenoir Cluster (House)] [Mattingly Report Figure 93]		
461	Comparison of municipal divisions of the enacted plan with the ensemble [(Pitt-Lenoir Cluster House)] [Mattingly Report Figure 94]		
462	The districts in each plan of the ensemble ordered from least to most compact [Union-Anson Cluster (House)] [Mattingly Report Figure 95]		
463	Comparison of municipal divisions of the enacted plan with the ensemble [(Union-Anson Cluster House)] [Mattingly Report Figure 96]		
464	The districts in each plan of the ensemble ordered from least to most compact [Wake Cluster (House)] [Mattingly Report Figure 97]		
465	Comparison of municipal divisions of the enacted plan with the ensemble [(Wake Cluster House)] [Mattingly Report Figure 98]		
466	The districts in each plan of the ensemble ordered from least to most compact [Yadkin-Forsyth (House)] [Mattingly Report Figure 99]		

Exhibit #	Description	Bates Number (if applicable)	Objection
467	Comparison of municipal divisions of the enacted plan with the ensemble [(Yadkin-Forsyth Cluster House)] [Mattingly Report Figure 100]		
468	Ranked vote marginals in Mecklenburg and Wake [Mattingly Report Figure 101]		
469	Parameters used when resampling senate clusters [Mattingly Report Table 8]		
470	Difference in the marginal distributions when considering incumbency [Mattingly Report Figure 102]		
471	Number of elections in which the enacted plan is a 1% outlier and a 0.1% outlier favoring either the Republican or the Democrats. [Mattingly Report Table 9]		
472	Difference in the marginal distributions when considering incumbency [Mattingly Report Figure 103]		
473	Difference in the marginal distributions when considering incumbency [Mattingly Report Figure 104]		
474	Ranked marginal distributions of each district in the ensemble from the most to least Republican district [Mattingly Report Figure 105]		
475	Convergence Statistics for cluster-level ensemble of maps for N.C. Senate [Mattingly Report Table 10]		
476	Convergence Statistics for cluster-level ensemble of maps for N.C. House [Mattingly Report Table 11]		
477	Convergence Statistics for cluster-level ensemble of maps that preserve incumbents [Mattingly Report Table 12]		
478	The total number of maps in the ensemble for the North Carolina Senate, along with the total number of unique maps [Mattingly Report Table 13]		

Exhibit #	Description	Bates Number (if applicable)	Objection
479	The total number of maps in the ensemble for the North Carolina House, along with the total number of unique maps [Mattingly Report Table 14]		
480	Number of samples gathered for the few additional ensembles gathered in order to test for the effects on the ensemble when preserving incumbency [Mattingly Report Table 15]		
481	Number of sub-samples in the North Carolina Senate. [Mattingly Report Table 16]		
482	Number of sub-samples in the North Carolina House. [Mattingly Report Table 17]		
483	Mattingly Report Appendix G - Ranked Marginal Distributions (House)		
484	Mattingly Report Appendix G - Ranked Marginal Distributions (Senate)		
485	Mattingly Report - Zoomed-in Ranked Marginal Distributions (House)		
486	Mattingly Report - Zoomed-in Ranked Marginal Distributions (Senate		
487	Rebuttal Report of Jonathan Mattingly		
488	(Mattingly Rebuttal Report Figure 1)		
489	Statewide distribution of elected Democrats over the 5 different initial conditions for the 2012 and 2016 Presidential vote counts for the North Carolina House and Senate [Mattingly Rebuttal Report Figure 2]		
490	[Mattingly Rebuttal Report Figure 3]		
491	Number of elections under the enacted plan is as or more extreme than a given percent of the ensemble of plans, favoring either the Republicans or Democrats. [Mattingly Rebuttal Report Table 1]		
492	[Mattingly Rebuttal Report Figure 4]		
493	[Mattingly Rebuttal Report Figure 5]		
494	[Mattingly Rebuttal Report Table 2]		
495	[Mattingly Rebuttal Report Figure 6]		
496	[Mattingly Rebuttal Report Table 3]		
497	[Mattingly Rebuttal Report Table 4)]		
498	[Mattingly Rebuttal Report Table 5]		

Exhibit #	Description	Bates Number (if applicable)	Objection
499	[Mattingly Rebuttal Report Figure 7]		
500	[Mattingly Rebuttal Report Figure 8]		
501	[Mattingly Rebuttal Report Table 6]		
502	[Mattingly Rebuttal Report Table 7]		
503	[Mattingly Rebuttal Report Table 8]		
504	[Mattingly Rebuttal Report Table 9]		
505	[Mattingly Rebuttal Report Figure 9]		
506	[Mattingly Rebuttal Report Figure 10]		
507	[Mattingly Rebuttal Report Table 10]		
508	Expert Report of Wesley Pegden		
509	Wesley Pegden, Ph.D.- Curriculum Vitae (Exhibit A to Pegden Report)		
510	Article - Chikina, Maria et al. "Assessing significance in a Markov chain without mixing" (Exhibit B to Pegden Report)		
511	Chikina, Maria et al., "Practical Tests for Significance in Markov Chains" (Exhibit C to Pegden Report)		
512	Random changes to a map (VTD) [Pegden Report Map 1]		
513	Random changes to a map (geounit) [Pegden Report Map 2]		
514	Comparison map examples (House) [Pegden Report Map 3]		
515	Whole state with 2016 voting data (House) [Pegden Report Table 1]		
516	Districts redrawn in 2017, with 2016 voting data (House) [Pegden Report Table 2]		
517	Unchanged 2011 districts with 2008 voting data (House) (Pegden Report Table 3)		
518	Comparison map examples (Senate) [Pegden Report Map 4]		
519	Whole state with 2016 voting data (Senate) [Pegden Report Table 4]		

Exhibit #	Description	Bates Number (if applicable)	Objection
520	Districts redrawn in 2017, with 2016 voting data (Senate) [Pegden Report Table 5]		
521	Unchanged 2011 districts with 2008 voting data (Senate) [Pegden Report Table 6)		
522	Alamance County (House) [Pegden Report Figure 1]		
523	Anson/Union Custer (House) [Pegden Report Figure 2]		
524	Brunswick/New Hanover Cluster (House) [Pegden Report Figure 3]		
525	Buncombe County (House) [Pegden Report Figure 4]		
526	Pender/Columbus/Robeson Cluster (House) [Pegden Report Figure 5]		
527	Guilford Cluster (House) [Pegden Report Figure 6]		
528	Duplin/Onslow Cluster (House) [Pegden Report Figure 7]		
529	Cumberland County (House) [Pegden Report Figure 8]		
530	Forsyth/Yadkin Cluster (House) [Pegden Report Figure 9]		
531	Mecklenburg (House) [Pegden Report Figure 10]		

Exhibit #	Description	Bates Number (if applicable)	Objection
532	Lenoir/Pitt (House) [Pegden Report Figure 11]		
533	Wake (House) [Pegden Report Figure 12]		
534	Gaston/Cleveland Cluster (House) [Pegden Report Figure 13]		
535	Richmond/Montgomery/Stanly-Cabarrus-Rowan/ Davie Cluster (House) [Pegden Report Figure 14]		
536	Person/Granville/Vance/Warren Cluster (House) [Pegden Report Figure 15]		
537	Franklin/Nash Cluster (House) [Pegden Report Figure 16]		
538	Davie/Forsyth (Senate) [Pegden Report Figure 17]		
539	Franklin/Wake (Senate) [Pegden Report Figure 18]		
540	Mecklenburg (Senate) [Pegden Report Figure 19]		
541	Transylvania-Henderson-Buncombe (Senate) [Pegden Report Figure 20]		
542	Lee/Sampson/Harnett/Duplin/Johnston/Nash (Senate) [Pegden Report Figure 21]		
543	Randolph/Guilford/Alamance (Senate) [Pegden Report Figure 22]		
544	Bladen/Pender/Brunswick/New Hanover (Senate) [Pegden Report Figure 23]		

Exhibit #	Description	Bates Number (if applicable)	Objection
545	Robustness to the choice of compactness metric Results for House [Pegden Report Table 7]		
546	Robustness to the choice of compactness metric Example maps for perimeter constraint (House) [Pegden Report Map 5]		
547	Robustness to the choice of compactness metric Results for Senate [Pegden Report Table 8]		
548	Robustness to the choice of compactness metric Example maps for perimeter constraint (Senate) [Pegden Report Map 6]		
549	Robustness to election / partisan metric Results for House [Pegden Report Table 9]		
550	Robustness to election / partisan metric Results for Senate [Pegden Report Table 10]		
551	Rebuttal Report of Wesley Pegden		
552	Pegden Rebuttal Report Figure 1.1		
553	Pegden Rebuttal Report Figure 1.2		
554	Pegden Rebuttal Report Figure 1.3		
555	Pegden Rebuttal Report Figure 1.4		
556	Pegden Rebuttal Report Figure 1.5		
557	Pegden Rebuttal Report Figure 1.6		

Exhibit #	Description	Bates Number (if applicable)	Objection
558	Pegden Rebuttal Report Figure 1.7		
559	Rebuttal Report of Lisa Handley		
560	Lisa Handley- Curriculum Vitae		
561	Elections with African American Candidates that Dr. Lewis Used or Chose Not to Use in His Analysis [Handley Rebuttal Report Table 1]		
562	NC House J-25 -Plan properties screenshot		
563	NC House Master July 18, 1200 -Plan properties screenshot		
564	NC House w New Raleigh - June 28 ~ Plan properties screenshot		
565	NC Senate J-24 - Plan properties screenshot		
566	NC Senate Master July 11 0115 Plan properties screenshot		
567	Plan properties screenshot from NC House A-1 from 20170811		
568	Plan properties screenshot from NC House J-3 from 20170814		
569	Plan properties screenshot from NC House J-25 from 20170628		
570	Plan properties screenshot from NC House J-25 from 20170814		
571	Plan properties screenshot from NC Senate J-23 from 20170813		

Exhibit #	Description	Bates Number (if applicable)	Objection
572	Plan properties screenshot from NC Senate J-24 from 20170624		
573	Plan properties screenshot from NC Senate J-24 from 20170712		
574	Dickson, et al v. Rucho - Defendants - Appellees' Brief		
575	Dickson, et al v. Rucho - Defendants - Appellees' Brief on Remand		
576	Fain, Travis. "Did House leader see new district 'long time before we did'?' WRAL.com,September 27, 2017.		
577	Blake Esselstyn- Curriculum Vitae		
578	Jon Matthews- Curriculum Vitae		
579	Legislative Defendants' & State of North Carolina Responses to Plaintiffs' First Set of Interrogatories, dated January 4, 2019		
580	State Defendants' Responses to Plaintiffs' First Set of Interrogatories, dated January 7, 2019		
581	Legislative Defendants' Objections and Responses to Plaintiffs' Second Set of Interrogatories, dated February 15, 2019		
582	Legislative Defendants' Objections and Responses to Plaintiffs' Third Set of Interrogatories, dated February 15, 2019		
583	Defendant- Intervenor's Responses to Plaintiffs' First Set of Interrogatories and Request for Production of Documents to Individual Defendant-Intervenors, dated April 3, 2019		
584	Legislative Defendants' Second Supplemental Objections and Responses to Plaintiffs' First Set of Interrogatories, dated, April 3, 2019		
585	Defendant- Intervenor's Responses to Plaintiffs' Second Set of Interrogatories and Request for Production of Documents to Individual Defendant-Intervenors, dated April 11, 2019		
586	Legislative Defendants' Supplemental Objections and Responses to Plaintiffs' Fourth Set of Interrogatories and Requests for Production, dated, April 30, 2019		

Exhibit #	Description	Bates Number (if applicable)	Objection
587	Legislative Defendants' Objections and Responses to Plaintiffs' First Request for admission, dated February 15, 2019		
588	2017 House and Senate Plans Criteria	LDNC001883	
589	Map of 2017 House Redistricting Plan		
590	August 28, 2017 House Floor Session		
591	Stat Pack for 2017 House Plan		
592	Additional Statistics on 2017 House Redistricting Plans		
593	August 28, 2017 Senate Floor Session		
594	Map of 2017 Senate Redistricting Plan		
595	August 29, 2017 Senate Redistricting Committee Meeting		
596	August 29, 2017 House Select Committee on Redistricting		
597	Stat Pack for 2017 Senate Redistricting Plan		
598	August 30, 2017 Senate Floor Session		
599	Additional Statistics on 2017 Senate Redistricting Plans		
600	August 30, 2017 House Floor Session		
601	July 26, 2017 Joint Redistricting Committee Meeting		
602	August 4, 2017 Joint Redistricting Committee Meeting		
603	August 10, 2017 Joint Redistricting Committee Meeting		
604	August 25, 2017 Senate Floor Session		
605	August 25, 2017 House Select Committee on Redistricting Meeting		
606	August 24, 2017 Senate Redistricting Committee Meeting		
607	Raleigh Public Hearing Transcript		
608	Beaufort Public Hearing Transcript		
609	Charlotte Public Hearing Transcript		
610	Fayetteville Public Hearing Transcript		
611	Hudson Public Hearing Transcript		
612	Jamestown Public Hearing Transcript		
613	Weldon Public Hearing Transcript		
614	Rep Pittman Amendment		
615	Rep Jackson Amendment - Redistricting Committee		
616	Rep Lewis Amendment		
617	Rep Speciale Amendment		
618	Sen Blue Amendment - Redistricting Committee		

Exhibit #	Description	Bates Number (if applicable)	Objection
619	Sen Blue Amendment - Senate Floor		
620	Sen Blue Amendment - Senate Floor Failed		
621	Sen Robinson Amendment - Withdrawn		
622	Sen Jeff Jackson Amendment		
623	Sen Robinson Amendment - Failed		
624	Sen Clark Amendment - Senate Floor		
625	Sen Clark Amendment - Redistricting Committee		
626	Rep Hunter Amendment		
627	House Bill 927 - Public Law		
628	Senate Bill 691 - Public Law		
629	Legislative Defendants Filing in *Covington* Attaching Legislative Record		
630	Public Policy Polling-2018		
631	Senate Bill 285		
632	House Bill 824		
633	Senate Bill 25		
634	House Bill 252		
635	H927 Bill History		
636	House vote (third reading) for House plan		
637	House vote (third reading) for Senate plan		
638	s691 Bill History		
639	Senate vote (third reading) for House plan		
640	Senate vote (third reading) for Senate plan		
641	Contract dated June 27, 2017	LDNC001879-LDNC001880	
642	Invoice dated September 1, 2017	LDNC001881	
643	Email from D. Lewis dated August 11, 2017	LDNC001882	
644	Common Cause Summary Stats	CC-00001	
645	2018 Campaign Finance Breakdown	NCDP 0039343	
646	State Senate District Snapshots		
647	State House District Snapshots		
648	Letter to NC DOJ, dated May 3, 2019		
649	T. Hofeller Media Received from Arnold & Porter Kaye Scholer LLP		

Exhibit #	Description	Bates Number (if applicable)	Objection
650	Letter to Setec Investigations dated May 3, 2019		
651	T. Hofeller Media Received from Arnold & Porter Kaye Scholer LLP		
652	Letter to Virtacore Systems,dated May 3, 2019		
653	T. Hofeller Media Received from Arnold & Porter Kaye Scholer LLP		
654	Declaration of Staci Goede on Behalf of the Republican State Leadership ...		
655	Declaration of Staci Goede on Behalf of the State Government Leadership ...		
656	Republican State Leadership Overview	RSLC0000101 9-21	
657	Redistricting 2010, Preparing for Success, RSLC June 7, 2009 PowerPoint slides		
658	RSLC Announces Redistricting Majority Project (REDMAP) - Press release		
659	Redistricting Majority Project PowerPoint slides		
660	REDMAP Political Report July 2010		
661	REDMAP Political Report July 2010		
662	E-mail to Tom Hofeller from Lindsay Fisher 05-23-08 Dear Legislative Leaders letter		
663	Dear Legislative Leaders letter from Chris Jankowski		
664	Final REDMAP Report		

Exhibit #	Description	Bates Number (if applicable)	Objection
665	REDMAP 2012 Summary Report		
666	REDMAP Political Report Final Report		
667	2012 RSLC Year in Review		
668	2012 Cycle Redistricting Budget		
669	2030 - What I've Learned about Redistricting The Hard Way! January 24, 2011 PowerPoint slides		
670	E-mail re TBH Travel to Raleigh May 21, 2012		
671	2011 Geographic Strategies invoices to Ogletree Deakins		
672	E-mail to Matt Walter from Chris Jankowski 2012-02-24 re Req for Payment and inv for Geographic Strategies		
673	Letter from Robin Hayes, RSLC		
674	Printout of Facebook Post, dated April 16, 2019 [Exhibit 2 to R. Reid Deposition]		
675	Printout of Facebook Post, dated April 10, 2019 [Exhibit 3 to R. Reid Deposition]		
676	Subpoena - Stephanie Hofeller [Exhibit 1 to S. Hofeller Deposition]		
677	Photographs of T. Hofeller Media Received from Arnold & Porter Kay Scholer LLP [Exhibit 2 to S. Hofeller Deposition]		
678	Aaron Matthew Wolff Affidavit		
679	Alyce Machak Affidavit		
680	Amy Oseroff Affidavit		
681	Ann McCracken Affidavit		
682	Carlton Campbell Affidavit		
683	David Dwight Brown Affidavit		
684	Deborah Anderson Smith Affidavit		

Exhibit #	Description	Bates Number (if applicable)	Objection
685	Derrick Miller Affidavit		
686	Donald Rumph Affidavit		
687	Dwight Jordan Affidavit		
688	Electa Person Affidavit		
689	George David Gauck Affidavit		
690	Howard Du Bose Affidavit		
691	James Nesbit Affidavit		
692	Joesph Thomas Gates Affidavit		
693	John Balla Affidavit		
694	John Mark Turner Affidavit		
695	Joshua Brown Affidavit		
696	Julie Frey Affidavit		
697	Karen Sue Holbrook Affidavit		
698	Kathleen Barnes Affidavit		
699	Kristin Parker Affidavit		
700	Leon Schaller Affidavit		
701	Lesley Wischmann Affidavit		
702	Mark Peters Affidavit		
703	Nancy Bradley Affidavit		
704	Nicole Quick Affidavit		
705	Pamela Morton Affidavit		
706	Paula Chapman Affidavit		
707	Rebecca Harper Affidavit		
708	Rebecca Johnson Affidavit		
709	Rosalyn Sloan Affidavit		
710	Stephen Douglas McGrigor Affidavit		
711	Tom Dunn Affidavit		
712	Vinod Thomas Affidavit		
713	Virginia Brien Affidavit		
714	William Service		
715	Jowei Chen Trial Subpoena		
716	Christopher Cooper Trial Subpoena		
717	Lisa Handley Trial Subpoena		
718	Jonathan Mattingly Trial Subpoena		
719	Wesley Pegden Trial Subpoena		
720	NC General Assembly - 2011 Redistricting Database - Field Layout		

Exhibit #	Description	Bates Number (if applicable)	Objection
721	Analysis of selected Democratic primary election contests and areas [Lewis Table 2]		
722	Analysis of selected general election contests and areas [Lewis Table 3]		
723	Analysis of a hypothetical 2016 general election contest in various areas [Lewis Table 4]		
724	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibaInc2731\C\MPRwork\NC Plans\NC Senate J-24 Backups\NC Senate J-24003.bak.zip		
725	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170807_211230_toshibaInc3011\C\MPRwork\NC Plans\NC House J-25 Backups\NC House J-25003.bak.zip		
726	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPRwork\NCPlans\NC Senate Master July 11 0115 Backups\NC Senate Master July 11 0115001.bak.zip		
727	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPRwork\NCPlans\NC House Master July 18 1200 Backups\NC House Master July 18 1200001.bak.zip		
728	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20150328_151333_toshiba\C\MPRwork\NCPlans\NC House w New Raleigh - June 28 Backups\NC House w New Raleigh - June 28005.bak.zip		
729	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170628_120524_toshibaInc2724\C\MPRwork\NC Plans\NC House J-25 Backups\NC House J-25003.bak.zip		

Exhibit #	Description	Bates Number (if applicable)	Objection
730	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibaInc2590\C\MPRwork\NC Plans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip		
731	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_071931_toshibaInc3051\C\MPRwork\NC Plans\NC House J-25 Backups\NC House J-25003.bak.zip		
732	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170813_172720_toshibaInc3047\C\MPRwork\NC Plans\NC Senate J-23 Backups\NC Senate J-23005.bak.zip		
733	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170811_083948_toshibaInc3039\C\MPRwork\NC Plans\NC House A-1 Backups\NC House A-1001.bak.zip		
734	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170814_203114_toshibaInc3065\C\MPRwork\NC Plans\NC House J-3 Backups\NC House J-3003.bak.zip		
735	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_093938_toshibaInc2590\C\MPRwork\NC Plans\NC Senate J-24 Backups\NC Senate J-24001.bak.zip		
736	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170712_151351_toshibaInc2792\C\MPRwork\NC Plans\NC Senate J-24 Backups\NC Senate J-24005.bak.zip		

Exhibit #	Description	Bates Number (if applicable)	Objection
737	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20161025_151544_toshibaInc1350\C\Users\toshiba\Documents\Tom\2017 Redistricting\FORMULA FOR POLITICAL ANALYSIS OF LEGISLATIVE DISTRICTS.docx		
738	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170607_152743_toshibaInc2347\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC House Plan June 7.xls		
739	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 D.xlsx		
740	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		
741	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170612_230105_toshibaInc2436\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx		
742	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170613_171944_toshibaInc2453\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC Senate Minimum-Partisan J-2.xlsx		
743	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170615_103911_toshibaInc2461\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members J-2.xlsx		

Exhibit #	Description	Bates Number (if applicable)	Objection
744	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170618_062153_toshibaInc2502\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members J-2.xlsx		
745	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170613_104847_toshibaInc2443\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members J-2.xlsx		
746	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170613_103309_toshibaInc2442\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members.xlsx		
747	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170615_103911_toshibaInc2461\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\Senate Minimum-Partisan-Members J-2.xlsx		
748	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170624_121146_toshibaInc2595\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\PPI Indicator Votes for New 2017 Legislative Districts.xlsx		
749	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 Renumbered.xls		
750	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170531_084929_toshibaInc2210\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx		

Exhibit #	Description	Bates Number (if applicable)	Objection
751	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170608_095810_toshibaInc2357\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members D.xlsx		
752	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170612_230105_toshibaInc2436\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\House Minimum-Partisan-Members.xlsx		
753	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		
754	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170708_130532_toshibaInc2751\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC Senate CCNC Sample Plan - June 2017.xls		
755	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170708_200016_toshibaInc2756\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC Senate CCNC PPI.xlsx		
756	C\Seagate Dashboard 2.0\TOSHIBA-PC\toshiba\Backup\f7bc3748-d314-4cc2-a86b-ea77894bb5b2\20170705_130329_toshibaInc2731\C\Users\toshiba\Documents\Tom\NC 2017 Redistricting\NC House CCNC Sample Plan - June 2017.xls		
757	Email from Woodrow to Myers, dated June 29, 2017	LDNC 014005	
758	Email from Inman to Boughton, dated August 22, 2019	LDNC 014109	
759	Email from Hofeller to Long, dated February 10, 2011 (produced in *Dickson*)	PS_00010258	
760	Email from Farr to Hofeller, dated March 10, 2011 (produced in Dickson)	PS_00010278	

PLAINTIFFS' EXHIBIT LIST
Common Cause, et al. v. David Lewis, et al.,

Exhibit #	Description	Bates Number (if applicable)	Objection
761	Email from Hofeller to Rucho & Farr, dated May 27, 2011 (produced in Dickson)	PS_00010318	
762	Email from Farr to Hofeller, dated May 27, 2011 (produced in Dickson)	PS_00010320	
763	Email from Raupe to Hofeller, dated June 13, 2011 (produced in Dickson)	PS_00010322	
764	2011 House Partisan Scoring Spreadsheet (produced in Dickson)	PS_00010323	
765	Email from Kay to Farr, dated June 30, 2011 (produced in Dickson)	PS_00010434	
766	Email from Woodcox to Farr, dated June 30, 2011 (produced in Dickson)	PS_00010435	
767	Email from Woodcox to Blaine, DATED June 30, 2011 (produced in Dickson)	PS_00010436	
768	Remaining Redistricting Preparation Tasks , dated February 2, 2011 (produced in Dickson)	PS_00010833	
769	2011 Redistricting Database Construction Status and Recommendations , January 14, 2011 (produced in Dickson)	PS_00010956	
770	Declaration of Jon G. Matthews		
771	Files Reviewed and Relied Upon by the Plaintiffs' Experts		
772	Mattingly Swing Animations		

*Plaintiffs reserve the right to use additional exhibits for cross-examination and in rebuttal.