IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, and PAUL KEARNEY, SR.,

Plaintiffs,

v.

TIMOTHY K. MOORE, in his official capacity as Speaker of the North Carolina House of Representatives; PHILLIP E. BERGER, in his official capacity as President Pro Tempore of the North Carolina Senate; DAVID R. LEWIS, 1 in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session; RALPH E. HISE, in his official capacity as Chairman of the Senate Select Committee on Election for the 2018 Third Extra Session; THE STATE OF NORTH CAROLINA; and THE NORTH CAROLINA STATE BOARD OF ELECTIONS,

Defendants.

[PROPOSED]
JOINT PRE-TRIAL ORDER

¹ David Lewis is no longer a member of the General Assembly.

Plaintiffs Jabari Holmes, Fred Culp, Daniel E. Smith, Brendon Jaden Peay, and Paul Kearny Sr. ("Plaintiffs") and Defendants Timothy K. Moore, Phillip E. Berger, Ralph E. Hise ("Legislative Defendants"), the State of North Carolina, and the North Carolina State Board of Elections ("State Defendants," and together with Plaintiffs and Legislative Defendants, the "Parties") hereby submit this Proposed Joint Pre-Trial Order.

I. List of Participating Counsel

A. Plaintiffs' Counsel

SOUTHERN COALITION FOR SOCIAL JUSTICE 1415 W. Highway 54, Suite 101 Durham, NC 27707

Allison J. Riggs State Bar No. 40028 Telephone: 919-323-3909 allison@southerncoalition.org

Jeffrey Loperfido State Bar No. 52939 Telephone: 919-323-3380 jeff@southerncoalition.org

Mitchell Brown State Bar No. 56122 Telephone: 919-323-3380 mitchellbrown@scsj.org

Hilary Harris Klein State Bar No. 53711 Telephone: 919-323-3380 hilaryhklein@southerncoalition.org

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP 1285 Avenue of the Americas New York, NY 10019 Andrew J. Ehrlich*

Telephone: 212-373-3166 aehrlich@paulweiss.com

David Giller*

Telephone: 212-373-3561 dgiller@paulweiss.com

Amitav Chakraborty* Telephone: 212-373-3242 achakraborty@paulweiss.com

Apeksha Vora*

 $\begin{array}{l} {\rm Telephone:~212~373~2706} \\ {\it avora@paulweiss.com} \end{array}$

Ryan Rizzuto*

Telephone: 212-373-3626 rrizzuto@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP 2001 K Street, NW Washington, D.C. 20006

Jane B. O'Brien*

Telephone: 202-223-7327 jobrien@paulweiss.com

Paul Brachman*

Telephone: 202-223-7440 pbrachman@paulweiss.com

Benjamin Symons*

Telephone: 202-223-7471 bsymons@paulweiss.com

Taylor Williams*

 $\begin{tabular}{ll} Telephone: 202-223-7405 \\ twilliams@paulweiss.com \end{tabular}$

(* admitted *pro hac vice*)

B. Defendants' Counsel

State Defendants

NORTH CAROLINA DEPARTMENT OF JUSTICE Post Office Box 629 Raleigh, NC 27602

Olga E. Vysotskaya de Brito Special Deputy Attorney General Telephone: 919-716-0185

Email: ovysotskaya@ncdoj.gov

Paul M. Cox

Special Deputy Attorney General

Telephone: 919-716-6932 Email: pcox@ncdoj.gov

Terence Steed Special Deputy Attorney General

Telephone: 919-716-6567 Email: <u>tsteed@ncdoj.gov</u>

Legislative Defendants

COOPER & KIRK, P.L.L.C. 1523 New Hampshire Ave. N.W. Washington, D.C. 20036

David H. Thompson*
Telephone: 202-220-9659
dthompson@cooperkirk.com

Nicole J. Moss State Bar No. 31958 Telephone: 202-220-9636 nmoss@cooperkirk.com

Peter A. Patterson*
Telephone: 202-220-9670
ppatterson@cooperkirk.com

Haley N. Proctor*

Telephone: 202-220-9636 hproctor@cooperkirk.com

Joseph Masterman*

Telephone: 202-220-9648 jmasterman@cooperkirk.com

John W. Tienkin**

Telephone: 202-220-9643 jtienken@cooperkirk.com

Nicholas A. Varone** Telephone: 202-220-9665 <u>nvarone@cooperkirk.com</u>

PHELPS DUNBAR LLP 4141 ParkLake Avenue, Suite 530 Raleigh, North Carolina 27612

Nathan A. Huff State Bar No. 40626 Telephone: 919-789-5300 nathan.huff@phelps.com

(* admitted pro hac vice) (** pro hac vice pending)

II. Stipulations

Counsel for each of the Parties hereby certifies that the Parties have met telephonically regarding stipulations of fact and testimony.

Counsel also hereby certify that, in the same meetings, they discussed trial logistics, and have reached agreement on certain stipulations regarding those issues.

The Parties' Pre-Trial Stipulations are attached hereto as Exhibit 1.

III. Statement of Claims that Remain to be Tried

A. Plaintiffs' Statement

Plaintiffs assert that Senate Bill 824 ("S.B. 824") as enacted and subsequently amended by the North Carolina General Assembly violates the Equal Protection Clause of Article I, § 19 of the North Carolina Constitution because it was enacted with the unlawful intent to discriminate against African American voters.

Plaintiffs allege, and contend that the evidence at trial will prove, that S.B. 824 bears more heavily on African American voters than white voters, that the enactment of S.B. 824 and its terms are consistent with the history of official discrimination against African American voters in North Carolina, and that the legislative history and events leading to the enactment of S.B. 824, including departures from the normal legislative process, reveal indicia of discriminatory intent.

B. Legislative Defendants' Statement

Legislative Defendants assert that S.B. 824 as enacted and subsequently amended by the North Carolina General Assembly does not violate the Equal Protection Clause of Article I, § 19 of the North Carolina Constitution.

Legislative Defendants allege, and contend that the evidence at trial will prove, that Plaintiffs have failed to carry their burden to show that S.B. 824 was enacted with the unlawful intent to discriminate against African American voters. Legislative Defendants also allege, and contend that the evidence at trial will prove,

that S.B. 824 was enacted for non-racial reasons, including to fulfill the North Carolina Constitution's mandate that the General Assembly enact legislation implementing the Constitution's photo voter ID mandate.

C. State Defendants' Statement

Given its expansive and permissive qualities, S.B. 824 complies with the North Carolina Constitution. The State Board therefore stands ready to implement the law in a nondiscriminatory way.

IV. Statement Regarding Trial Logistics

A. Plaintiffs' Trial Duration Statement

Plaintiffs request approximately 30 hours of trial time, which encompasses their estimate for opening, closing, direct testimony of Plaintiffs' witnesses, and anticipated cross-examination of Defendants' witnesses.

B. Defendants' Trial Duration Statement

Defendants request approximately 30 hours of trial time, which encompasses their estimate for opening, closing, direct testimony of Defendants' witnesses, and anticipated cross-examination of Plaintiffs' witnesses.

C. Joint Statement Regarding Remote Trial Logistics

The Parties have conferred telephonically and respectfully propose the following protocols for the conduct of the remote trial in this matter:

1. The Parties shall exchange and provide to the Court via Secure File Transfer Protocol ("SFTP") copies of stamped Exhibits at least seven (7) days

prior to trial. If the Court, or any member of the Court, prefers hard copies of the Exhibits, the parties are prepared to deliver binders containing the Exhibits to Your Honors via FedEx.

- 2. When a witness is shown an Exhibit or examined on the contents of an Exhibit, the questioning Party shall make the Exhibit visible to the Court and other Parties.
- 3. All Exhibits admitted into evidence during any trial day shall be provided electronically to the Trial Court Administrator, or the Court's Clerk or other designee, at the conclusion of each trial day.
- 4. In the event a Party wishes to introduce into evidence an Exhibit designated as CONFIDENTIAL or HIGHLY CONFIDENTIAL under the governing Protective Order, the Parties shall meet and confer regarding appropriate steps to maintain the confidentiality of the Exhibit. If the Parties are unable to agree that the confidentiality designation should be withdrawn, the Parties will propose redactions to the Exhibit. If the Parties are unable to agree to redactions necessary to exclude the confidential or highly confidential information, any Party may move the Court for leave to submit such Exhibit under seal and conduct any examination on the Exhibit under seal.
- 5. The Parties will each have 45 minutes per side for opening arguments with Defendants' 45 minutes to be split as mutually agreed upon by State and Legislative Defendants.

V. Deposition Designations

The Parties have exchanged proposed deposition designations that may be offered at trial and objections and counter-designations thereto. The Parties will provide the Court with information on the Parties' deposition designations in whatever form the Court prefers.

VI. Exhibit Lists

Attached hereto as Exhibit 2 is the parties' Joint Exhibit List. The exhibits are labeled JX[#]. Except as indicated, the parties do not object to the admission of the documents listed on the parties' Joint Exhibit List and stipulate that they are admissible.

Attached hereto as Exhibit 3 is Plaintiffs' Exhibit List. Plaintiffs' exhibits are labeled PX[#]. Defendants' objections are indicated.

Attached hereto as Exhibit 4 is Legislative Defendants' Exhibit List.

The exhibits are labeled LX[#]. Plaintiffs' objections are indicated.

VII. Statement of Relief Sought

A. Declaratory Judgment

Plaintiffs seek declaratory judgment declaring that S.B. 824 as amended violates the equal protection clause of Article I, § 19 of the North Carolina Constitution.

B. Permanent Injunction

Plaintiffs seek a permanent injunction barring the enforcement of S.B. 824 and allowing qualified, registered voters without acceptable photo identification at the polls to cast regular ballots.

Dated: March 29, 2021

By: /s/Allison J. Riggs

Allison J. Riggs State Bar No. 40028 Telephone: 919-323-3909 allison@southerncoalition.org

SOUTHERN COALITION FOR SOCIAL JUSTICE 1415 W. Highway 54, Suite 101 Durham, NC 27707

Andrew J. Ehrlich* David Giller*

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP 1285 Avenue of the Americas New York, NY 10019

Jane B. O'Brien* Paul Brachman*

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP By: /s/ Nicole J. Moss

Nicole J. Moss State Bar No. 31958 Telephone: 202-220-9636 nmoss@cooperkirk.com

COOPER & KIRK, PLLC 1523 New Hampshire Ave. N.W. Washington, D.C. 20036

Nathan A. Huff State Bar No. 40626 Telephone: 919-789-5300

PHELPS DUNBAR LLP 4140 ParkLake Avenue, Suite 100

Raleigh, North Carolina 27612

Counsel for Legislative Defendants

2001 K Street, NW Washington, D.C. 20006

(* admitted pro hac vice)

Counsel for Plaintiffs

By: /s/ Paul M. Cox

Paul M. Cox Special Deputy Attorney General N.C. State Bar No. 49146 Email: pcox@ncdoj.gov

Phone: 919-716-6932

NORTH CAROLINA DEPARTMENT OF JUSTICE N.C. Department of Justice Post Office Box 629 Raleigh, NC 27602

Olga E. Vysotskaya de Brito Special Deputy Attorney General N.C. State Bar No. 31846 Email: ovysotskaya@ncdoj.gov

Terence Steed Special Deputy Attorney General N.C. State Bar No. 52809 Email: tsteed@ncdoj.gov

Counsel for State Defendants

EXHIBIT 1Parties' Pre-Trial Stipulations

STATE OF NORTH CAROLINA COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 18 CVS 15292

JABARI HOLMES, FRED CULP, DANIEL E. SMITH, BRENDON JADEN PEAY, and PAUL KEARNEY, SR.,

Plaintiffs,

v.

TIMOTHY K. MOORE, in his official capacity as Speaker of the North Carolina House of Representatives; PHILIP E. BERGER, in his official capacity as President Pro Tempore of the North Carolina Senate; DAVID R. LEWIS, in his official capacity as Chairman of the House Select Committee on Elections for the 2018 Third Extra Session; RALPH E. HISE, in his official capacity as Chairman of the Senate Select Committee on Elections for the 2018 Third Extra Session; THE STATE OF NORTH CAROLINA; and THE NORTH CAROLINA STATE BOARD OF ELECTIONS,

PARTIES' PRE-TRIAL STIPULATIONS

Defendants.

Plaintiffs Jabari Holmes, Fred Culp, Daniel E. Smith, Brendon Jaden Peay, and Paul Kearney, Sr. (collectively, "Plaintiffs") and Defendants Timothy K. Moore, Philip E. Berger, Ralph E. Hise, the State of North Carolina, and the North Carolina State Board of Elections (collectively, "Defendants") (Plaintiff and Defendants each a "Party" and together the "Parties"), by and through undersigned counsel stipulate to the matters set forth below (the "Stipulation").

¹ On August 20, 2020, David Lewis resigned from the General Assembly.

The Stipulation will govern the conduct at trial of the Parties, through counsel, representatives, and all witnesses tendered (whether live or by deposition). Should one Party believe that the opposing Party introduced evidence or presented argument at trial that opens the door to argument or evidence that would otherwise be precluded by the Stipulation, that Party will first, to the extent practicable, raise the issue with the opposing Party to determine if the issue can be resolved. If it is not practicable for a Party to first raise the issue with the opposing Party or the Parties are unable to resolve the issue after conferring, then the Party shall approach the Court before seeking to introduce evidence that is otherwise subject to the Stipulation.

I. Uncontested Facts

The Parties stipulate to the following uncontested facts:

A. Plaintiffs' Proposed and Agreed Stipulations:

- 1. By 2013 African American voter registration and voting turnout rates had reached near-parity with white registration and turnout rates.
- 2. Forty North Carolina jurisdictions were considered "covered jurisdictions" under Section 5 of the Voting Rights Act.
- 3. The North Carolina General Assembly first attempted to pass a voter ID law in 2011, H.B. 351.
- 4. Governor Beverly Perdue vetoed the 2011 proposed voter ID bill.
- 5. Governor Perdue said the 2011 proposed voter ID "bill, as written, will unnecessarily and unfairly disenfranchise many eligible and legitimate voters." In her veto message, Governor Perdue also said that the 2011 proposed voter ID bill was "nowhere sanctioned in our State Constitution."
- 6. On March 5, 2013, Representative Harry Warren and various other sponsors of HB589 requested a cross-matching of registered voters who have "neither a NC Driver's License nor a NC Identification Card" and the "number of one-stop voters and

provisional voters." Representative Warren requested that both inquiries be broken down by all possible demographics that SBOE captures, including "party affiliation, ethnicity, gender, etc."

- 7. H.B. 589 was initially introduced on April 4, 2013.
- 8. As drafted, the first version of H.B. 589 introduced on April 4, 2013, permitted voting using the following forms of identification: (1) An identification card that bears either a date of expiration or a date of issuance and that is not more than 10 years beyond the date of expiration or issuance, whichever is later, issued by a branch, department, agency, or entity of the United States, this State, or any other state, such as any of the following: (a) A North Carolina drivers license issued under Article 2 of Chapter 20 of the General Statutes, including a learner's permit or a provisional license; (b) A special identification card for nonoperators issued under G.S. 20-37.7; (c) A United States passport; (d) An employee identification; (e) A United States military identification card; (f) An identification card issued by The University of North Carolina and its constituent institutions; (g) An identification card issued by a North Carolina community; (h) An identification card issued to a fireman, EMS, hospital employee, or law enforcement officer. (2) A tribal identification card. (3) An identification card that bears a date of expiration and was not expired on 9 the day the voter reached the age of 70 issued by a branch, department, 10 agency, or entity of the United States, this State, or any other state.
- 9. The U.S. Supreme Court issued its decision in *Shelby County* v. *Holder* on June 25, 2013.
- 10. Following the U.S. Supreme Court's decision in *Shelby County* v. *Holder*, Tom Apodaca, the Republican chairman of the North Carolina Senate's Committee on Rules and Operations told local reporters, "Now we can go with the full bill."
- 11. On July 23, 2013, the North Carolina Senate's Committee on Rules and Operations reported and adopted a committee substitute bill of H.B. 589 which eliminated from the list of acceptable IDs state university IDs, community college IDs, and IDs that were issued as part of a government public assistance program; reduced the days of early voting; and eliminated same-day registration, out-of-precinct voting, and pre-registration.
- 12. The version of H.B. 589 reported and adopted by the Senate's Committee on Rules and Operations on July 23, 2013, permitted

voting using the following forms of identification: As used in this section, "photo identification" means any one of the following that contains a photograph of the registered voter. In addition, the photo identification shall have a printed expiration date and has not expired, provided that any voter having attained the age of 70 years at the time of presentation at the voting place shall be permitted to present an expired form of any of the following that was unexpired on the voter's 70th birthday. Notwithstanding the previous sentence, in the case of identification under subdivisions (4) through (6) of this subsection, if it does not contain a printed expiration date, it shall be acceptable if it has a printed issuance date that is not more than eight years before it is presented for voting: (1) A North Carolina drivers license issued under Article 2 of Chapter 20 of the General Statutes, including a learner's permit or a provisional license. (2) A special identification card for nonoperators issued under G.S. 20-37.7. (3) A United States passport. (4) A United States military identification card, except there is no requirement that it have a printed expiration or issuance date. (5) A Veterans Identification Card issued by the United States Department of Veterans Affairs for use at Veterans Administration medical facilities facilities, except there is no requirement that it have a printed expiration or issuance date. (6) A tribal enrollment card issued by a federally recognized tribe or a tribe recognized by this State under Chapter 71A of the General Statutes. (7) A drivers license or nonoperators identification card issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election.

- 13. The North Carolina General Assembly passed H.B. 589 on July 25, 2013.
- 14. As passed on July 25, 2013, H.B. 589 provided: As used in this section, "photo identification" means any one of the following that contains a photograph of the registered voter. In addition, the photo identification shall have a printed expiration date and shall be unexpired, provided that any voter having attained the age of 70 years at the time of presentation at the voting place shall be permitted to present an expired form of any of the following that was unexpired on the voter's 70th birthday. Notwithstanding the previous sentence, in the case of identification under subdivisions (4) through (6) of this subsection, if it does not contain a printed expiration date, it shall be acceptable if it has a printed issuance date that is not more than eight years before it is presented for voting: (1) A North Carolina drivers license issued under Article 2 of Chapter 20 of the General Statutes, including a learner's permit or a provisional license. (2) A special identification card for

nonoperators issued under G.S. 20-37.7. (3) A United States passport. (4) A United States military identification card, except there is no requirement that it have a printed expiration or issuance date. (5) A Veterans Identification Card issued by the United States Department of Veterans Affairs for use at Veterans Administration medical facilities facilities, except there is no requirement that it have a printed expiration or issuance date. (6) A tribal enrollment card issued by a federally recognized tribe. (7) A tribal enrollment card issued by a tribe recognized by this State under Chapter 71A of the General Statutes, provided that card meets all of the following criteria: a. Is issued in accordance with a process approved by the State Board of Elections that requires an application and proof of identity equivalent to the requirements for issuance of a special identification card by the Division of Motor Vehicles under G.S. 20-7 and G.S. 20-37.7. b. Is signed by an elected official of the tribe. (8) A drivers license or nonoperators identification card issued by another state, the District of Columbia, or a territory or commonwealth of the United States, but only if the voter's voter registration was within 90 days of the election.

- 15. The following individual legislators in the House, all Republicans, voted in favor of H.B. 589 in vote M11 concur: Arp; Avila; Bell, J.; Blackwell; Blust; Boles; Brawley, R.; Brawley, W.; Brody; Brown, B.; Brown, R.; Bryan; Bumgardner; Burr; Catlin; Collins; Conrad; Daughtry; Davis; Dixon; Dollar; Elmore; Faircloth; Ford; Fulghum; Hager; Hardister; Hastings; Hollo; Holloway; Horn; Hurley; Iler; Jeter; Johnson; Jones; Jordan; Langdon; Lewis; Malone; Martin, S; McElraft; McGrady; McNeill; Millis; Moffitt; Moore, T.; Murry; Pittman; Presnell; Ramsey; Riddell; Ross, S.; Saine; Samuelson; Schaffer; Setzer; Shepard; Speciale; Stam; Starnes; Steinburg; Stone; Szoka; Tillis (Speaker); Torbett; Turner; Warren, H.; Wells; West; Whitmire; Younts.
- 16. The following individual legislators in the Senate, all Republicans, voted in favor of H.B. 589 on third reading: Allran; Apodaca (Chair); Barefoot; Barringer; Berger; Bingham; Brock; Brown; Brunstetter; Cook; Curtis; Daniel; Davis, J.; Goolsby; Gunn; Harrington; Hartsell; Hise; Hunt; Jackson; Meredith; Newton; Pate; Rabin; Rabon; Randleman; Rucho; Sanderson; Soucek; Tarte; Tillman; Tucker; Wade.
- 17. The following individual legislators in the Senate, all Democrats, voted against H.B. 589 on third reading: Blue; Bryant; Clark; Davis, D.; Ford; Graham; Kinnaird; McKissick; McLaurin; Nesbitt; Parmon; Robinson; Stein; Woodard.

- 18. The following individual legislators in the House, all Democrats, voted against H.B. 589 in vote M11 concur: Adams; Alexander; Baskerville; Bell, L.; Brandon; Carney; Cotham; Cunningham; Earle; Farmer-Butterfield; Fisher; Floyd; Foushee; Gill; Glazier; Goodman; Graham, C.; Graham, G.; Hall, D.; Hall, L.; Hamilton; Hanes; Harrison; Holley; Insko; Jackson; Lucas; Luebke; Martin, G; McManus; Michaux; Mobley; Moore, R.; Pierce; Queen; Richardson; Terry; Tine; Tolson; Waddell; Wilkins.
- 19. H.B. 589 was challenged in federal court in a lawsuit filed on September 30, 2013, alleging that H.B. 589 violated the Fourteenth and Fifteenth Amendments of the United States Constitution, and the Voting Rights Act (VRA), under the case caption *NAACP* v. *McCrory*, 1:13-cv-00861-TDS-JEP.
- 20. On June 22, 2015, the North Carolina General Assembly amended H.B. 589 to include a "reasonable impediment" exception.
- 21. In the March 2016 primary, 1,048 voters completed a declaration of reasonable impediment. Of these, the State Board has represented that 184 had their votes discounted by reason of lack of acceptable identification.
- 22. In the March 2016 primary, 1,248 voters did not present acceptable photo ID or execute a reasonable impediment declaration or return to the county office by the deadline. All 1,248 of these votes did not count.
- 23. The Fourth Circuit ordered that certain provisions of H.B. 589 be enjoined in *North Carolina State Conference of NAACP* v. *McCrory*, 831 F.3d 204 (4th Cir. 2016), *cert denied* 137 S. Ct. 1399 (2017).
- 24. On July 29, 2016, the Fourth Circuit's opinion stated that, "On appeal, Plaintiffs reiterate their attacks on the photo ID requirement, the reduction in days of early voting, and the elimination of same-day registration, out-of-precinct voting, and preregistration, alleging discrimination against African Americans and Hispanics. Because the record evidence is limited regarding Hispanics, we confine our analysis to African Americans. We hold that the challenged provisions of SL 2013-381 were enacted with racially discriminatory intent in violation of the Equal Protection Clause of the Fourteenth Amendment and § 2 of the Voting Rights Act."
- 25. The Fourth Circuit stated, "As the district court found, prior to enactment of SL 2013-381, the legislature requested and received

- racial data as to usage of the practices changed by the proposed law. . . . This data showed that African Americans disproportionately lacked the most common kind of photo ID, those issued by the Department of Motor Vehicles (DMV)."
- 26. The Fourth Circuit stated, "The district court found that . . . African Americans were more likely to 'experience socioeconomic factors that may hinder their political participation.' . . . This is so, the district court explained, because in North Carolina, African Americans are 'disproportionately likely to move, be poor, less educated, have less access to transportation, and experience poor health.""
- 27. On May 15, 2017, Speaker Tim Moore and Senate Leader Phil Berger issued the following statement: "It is unconscionable that Roy Cooper and Josh Stein who ignored state law and flouted their conflicts of interest to kill voter ID in North Carolina have now caused the vast majority of voters who support voter ID to be denied their day in court. In light of Chief Justice Roberts' statement that the ruling was not based on the merits of voter ID, all North Carolinians can rest assured that Republican legislators will continue fighting to protect the integrity of our elections by implementing the commonsense requirement to show a photo ID when we vote."
- 28. On June 29, 2018, the North Carolina General Assembly ratified H.B. 1092.
- 29. H.B. 1092 added to the November 6, 2018 election ballot a referendum for a "Constitutional amendment to require voters to provide photo identification before voting in person."
- 30. North Carolina held state and local elections on November 6, 2018.
- 31. On November 6, 2018, voters passed four referenda to amend the Constitution of North Carolina: the amendment referenced in H.B. 1092, the amendment referenced in Marsy's Law (H.B. 551), the amendment referenced in S.B. 677, and the amendment referenced in S.B. 75.
- 32. The amendments referenced in H.B. 1092 and Marsy's Law each required implementing legislation.
- 33. The amendments referenced in S.B. 677 and S.B. 75 did not require implementing legislation.

- 34. Between November 6, 2018 and January 1, 2019, Republicans held 75 of 120 seats in the North Carolina House of Representatives.
- 35. Between November 6, 2018 and January 1, 2019, Republicans held more than three-fifths of the total seats in the North Carolina House of Representatives.
- 36. Between November 6, 2018 and January 1, 2019, Republicans held 35 of 50 seats in the North Carolina Senate.
- 37. Between November 6, 2018 and January 1, 2019, Republicans held more than three-fifths of the total seats in the North Carolina Senate.
- 38. Since January 1, 2017, the governor of North Carolina has been Roy Cooper. Governor Cooper has been a member of the Democratic Party since at least January 1, 2017.
- 39. In *North Carolina v. Covington*, 137 S. Ct. 2211 (2017), the Supreme Court affirmed a judgment of the Middle District of North Carolina finding that "twenty-eight challenged districts in North Carolina's 2011 State House and Senate redistricting plans constitute racial gerrymanders in violation of the Equal Protection Clause of the Unite States Constitution."
- 40. The U.S. Supreme Court affirmed the District Court's decision to redraw certain districts, and it reversed the District Court's decision to redraw certain other districts.
- 41. As a result of the election on November 6, 2018, Republicans lost 10 of the 75 seats they had previously held in the North Carolina House of Representatives to Democratic candidates.
- 42. As a result of the election on November 6, 2018, Republicans no longer held three-fifths of the seats in the North Carolina House of Representatives on January 1, 2019.
- 43. As a result of the election on November 6, 2018, Republicans lost 6 of the 35 seats they had previously held in the North Carolina Senate to Democratic candidates.
- 44. As a result of the election on November 6, 2018, Republicans no longer held three-fifths of the seats in the North Carolina Senate on January 1, 2019.

- 45. The General Assembly adjourned its regular session on June 29, 2018 and reconvened the regular session on November 27, 2018.
- 46. House Joint Resolution 1101 provided that, "[d]uring the regular session that convenes on Tuesday, November 27, 2018, the restrictions contained in Section 3.2 of Resolution 2017-12 and the request and filing deadlines in the Permanent Rules of the Senate and the House of Representatives do not apply."
- 47. Between 1986 and 2018, the General Assembly convened in lame-duck sessions on three occasions, holding one such session in 2002, one in 2004, and three in 2016.
- 48. Prior to December 2018, the North Carolina General Assembly had never before enacted legislation to implement a constitutional amendment during a lame-duck session.
- 49. Prior to the November 2018 General Election, a party with a veto-proof majority in the North Carolina General Assembly had never lost that majority while the Governor was a member of a different party.
- 50. Governor Cooper's veto of S.B. 824 was the first time in history a Governor of North Carolina vetoed legislation implementing a constitutional amendment since North Carolina Governors received the power to veto acts of the North Carolina Legislature in 1995.
- 51. The General Assembly's first use of its power to override the Governor's veto during a post-election regular session was in December 2018.
- 52. During the session reconvened between the November 6, 2018 election and January 1, 2019, the General Assembly acted upon 38 bills and resolutions and passed 10 laws in total.
- 53. The session reconvened between the November 6, 2018 election and January 1, 2019 did not address the amendment referenced in Marsy's Law.
- 54. The implementing legislation for the amendment referenced in Marsy's Law was passed on August 28, 2019.
- 55. S.B. 824 was passed during a "lame-duck" legislative session.
- 56. Under Article II, Section 9 of the North Carolina Constitution, legislators' terms begin on the first day of the January after their

- election. The convening date for the 2019 General Assembly was January 9, 2019.
- 57. North Carolina General Assembly Staff Attorney Jessica Sammons gave a presentation on the initial draft legislation of S.B. 824 to the Joint Elections Oversight Committee on November 26, 2018.
- 58. The draft language of S.B. 824 was first filed with the Senate Principal Clerk on November 27, 2018.
- 59. S.B. 824 was introduced in the Senate on November 27, 2018.
- 60. The primary sponsors of S.B. 824 were Senators Krawiec, Ford, and Daniel.
- 61. The Joint Elections Oversight Committee received public comment on S.B. 824 at the November 26, 2018 hearing from the 30 people who offered to make public comment at the hearing.
- 62. The Joint Elections Oversight Committee allocated two minutes for each individual to make public comment on S.B. 824 at the November 26, 2018 hearing.
- 63. The Committee also accepted written statements and other documents from the speakers and from other members of the public.
- 64. On December 3, 2018, during a meeting of the Committee on Elections and Ethics Law, Rep. Bert Jones stated, "Members, the chair will just go ahead and announce that because we do have further comments and discussion, and we've got some amendments to get to, and we've got session in a little while, that this will not be a time for public comments at this meeting." The Committee held its public-comment period when it reconvened the next day.
- 65. On December 3, 2018, during a meeting of the Committee on Elections and Ethics Law, Rep. Fisher requested that the chairman "make an extra effort to hear from the public when [the committee] reconvene." Representative Fisher made this request after Chairman Jones announced that the Committee would adjourn and reconvene the following morning, and that the Chairman responded that the request would be taken under advisement.

- 66. The Committee on Elections and Ethics Law allotted one minute to each individual making public comment on S.B. 824 at its December 4, 2018 hearing.
- 67. After S.B. 824 passed its first reading and was reported favorably out of two committees, the Senate held floor debate on November 28, 2018, during which eleven amendments to the bill were proposed and six were adopted.
- 68. The North Carolina Senate voted in favor of Amendment 1 to S.B. 824 on November 28, 2018 at 4:59 p.m., by a vote of 43-0.
- 69. The North Carolina Senate voted in favor of tabling Amendment 6 to S.B. 824 on November 28, 2018 by a margin of 29 to 13, with 28 Republicans and 1 Democrat voting aye, and 13 Democrats voting no.
- 70. On November 28, 2018, the North Carolina Senate did not engage in any debate over the substance of Amendment 6 to S.B. 824 before voting to table the amendment. The substance of Amendment 6 did not address the voter ID requirement.
- 71. The North Carolina Senate did not reconsider Amendment 6 to S.B. 824 after the amendment was tabled.
- 72. The North Carolina Senate voted in favor of tabling Amendment 7 to S.B. 824 on November 28, 2018 by a margin of 31 to 12, with 29 Republicans and two Democrats voting aye, and 12 Democrats voting no.
- 73. The North Carolina Senate did not reconsider Amendment 7 to S.B. 824 after the amendment was tabled.
- 74. The North Carolina Senate voted in favor of tabling Amendment 8 to S.B. 824 on November 28, 2018 by a margin of 29 to 14, with 28 Republicans and 1 Democrat voting aye, and 14 Democrats voting no.
- 75. After the President asked whether there would be any discussion or debate on Amendment 8, the North Carolina Senate did not engage in any debate over the substance of Amendment 8 to S.B. 824 before voting to table the amendment.
- 76. The North Carolina Senate did not reconsider Amendment 8 to S.B. 824 after the amendment was tabled.
- 77. The North Carolina Senate voted in favor of tabling Amendment 9 to S.B. 824 on November 28, 2018 by a margin of 30 to 12,

- with 29 Republicans and one Democrat voting aye, and 12 Democrats voting no.
- 78. After the President asked whether there would be any discussion or debate on Amendment 9, the North Carolina Senate did not engage in any debate over the substance of Amendment 9 to S.B. 824 before voting to table the amendment.
- 79. The North Carolina Senate did not reconsider Amendment 9 to S.B. 824 after the amendment was tabled.
- 80. The North Carolina Senate voted in favor of Amendment 11 to S.B. 824 on November 28, 2018 at 5:55 p.m., by a vote of 40 to 3.
- 81. The North Carolina Senate passed S.B. 824 on its Second Reading on November 28, 2018 at 5:56 p.m. after the President called for any further discussion or debate and none was offered. The vote was 32 to 11, with twenty-nine Republicans and three Democrats voting aye, and eleven Democrats voting no.
- 82. The North Carolina Senate passed S.B. 824 on its Third Reading on November 29, 2018 by a vote of 30 to 10. Twenty-eight Republicans and two Democrats voted aye, and 10 Democrats voted no.
- 83. On December 4, 2018, S.B. 824 was placed on the calendar to be considered by the North Carolina House of Representatives.
- 84. On December 5, 2018, S.B. 824 passed in the North Carolina House of Representatives on its Second Reading on December 5, 2018 at 4:43 p.m. by a vote of 67 to 40. Sixty-five Republicans and two Democrats voted aye, and thirty-nine Democrats and one Republican voted no.
- 85. S.B. 824 passed in the North Carolina House of Representatives on its Third Reading by a margin of 67 to 40 on December 5, 2018 at 4:44 p.m. by a vote of 67 to 40. Sixty-five Republicans and two Democrats voted aye, and thirty-nine Democrats and one Republican voted no.
- 86. Discussion and debate on S.B. 824 in committee or on the floor of House of Representatives lasted between 12 and 13 hours.
- 87. The General Assembly passed S.B. 824 on December 6, 2018.
- 88. The following individual legislators in the House voted in favor of S.B. 824 on third reading: Adams (R); J. Adcock (R); Arp (R); Blust (R); Boles (R); Brawley (R); Brenden Jones (R); Brisson

- (R); Brody (R); Bumgardner (R); Burr (R); Clampitt (R); Cleveland (R); Collins (R); Conrad (R); Corbin (R); Davis (R); Destin Hall (R); Dixon (R); Dobson (R); Dollar (R); Duane Hall (D); Dulin (R); Faircloth (R); Ford (R); Fraley (R); Goodman (D); K. Hall (R); Hardister (R); Hastings (R); Henson (R); Horn (R); Howard (R); Hurley (R); Iler (R); Johnson (R); Lambeth (R); Lewis (R); Malone (R); McElraft (R); McGrady (R); McNeill (R); T. Moore (Speaker) (R); Muller (R); Murphy (R); Pittman (R); Potts (R); Presnell (R); Riddell (R); Rogers (R); Ross (R); Saine (R); Sauls (R); Setzer (R); Shepard (R); Speciale (R); Steinburg (R); Stone (R); Strickland (R); Szoka (R); Torbett (R); R. Turner (R); Warren (R); Watford (R); White (R); Yarborough (R); Zachary (R).
- 89. The following individual legislators in the Senate voted in favor of S.B. 824 on third reading: Alexander (R); Ballard (R); Barefoot (R); Barrett (R); Barringer (R); Berger (R); Bishop (R); Britt (R); Brown (R); Cook (R); Daniel (R); D. Davis (D); J. Davis (R); Dunn (R); Edwards (R); Ford (D); Gunn (R); Hise (R); Horner (R); B. Jackson (R); Krawiec (R); McInnis (R); Newton (R); Rabin (R); Rabon (R); Randleman (R); Sanderson (R); Sawyer (R); Tillman (R); Wells (R).
- 90. The following individual legislators in the House voted against S.B. 824 on third reading: G. Adcock (D); Ager (D); Alexander (D); Autry (D); Ball (D); Beasley (D); Belk (D); L. Bell (D); Black (D); Brockman (D); Butler (D); Carney (D); Cunningham (D); Earle (D); Farmer-Butterfield (D); Fisher (D); Floyd (D); Garrison (D); Gill (D); C. Graham (D); Harrison (D); Holley (D); Hunter (D); Insko (D); Jackson (D); John (D); Jordan (R); Lucas (D); G. Martin (D); Michaux (D); Montgomery (D); Morey (D); Pierce (D); Quick (D); Reives (D); B. Richardson (D); Terry (D); B. Turner (D); Willingham (D); Wray (D).
- 91. The following individual legislators in the Senate voted against S.B. 824 on third reading: Chaudhuri (D); Fitch (D); Foushee (D); Lowe (D); McKissick (D); Robinson (D); Smith (D); Van Duyn (D); Waddell (D); Woodard (D).
- 92. Under Article 2, Section 22(1) of the North Carolina Constitution, after vetoing a bill "the Governor shall return it with objections, together with a veto message stating the reasons for such objections, to that house in which it shall have originated If after such reconsideration three-fifths of the members of that house present and voting shall agree to pass the bill, it shall be sent, together with the objections and veto message, to the other

- house, by which it shall likewise be reconsidered; and if approved by three-fifths of the members of that house present and voting, it shall become a law notwithstanding the objections of the Governor."
- 93. S.B. 824 was presented to Governor Roy Cooper on December 6, 2018.
- 94. Governor Cooper vetoed S.B. 824 on December 14, 2018.
- 95. The North Carolina Senate overrode Governor Cooper's veto by a vote of 33-12 on December 18, 2018.
- 96. On December 18, 2018, Republicans in the North Carolina Senate voted in favor of overriding Governor Cooper's veto of S.B. 824 by a margin of 32 to 0. Three Republican members were excused absences and did not vote.
- 97. On December 18, 2018, Democrats in the North Carolina Senate voted against overriding Governor Cooper's veto of S.B. 824 by a margin of 12 to 1. One Democratic Senator was present but did not vote and another was an excused absence and did not vote.
- 98. On December 19, 2018, the North Carolina House of Representatives voted in favor of overriding Governor Roy Cooper's veto of S.B. 824 by a margin of 72 to 40.
- 99. On December 19, 2018, Republicans in the North Carolina House of Representatives voted in favor of overriding Governor Cooper's veto of S.B. 824 by a margin of 71 to 0. Two Republican Representatives were present but did not vote and two were excused absences and did not vote.
- 100. On December 19, 2018, Democrats in the North Carolina House of Representatives voted against overriding Governor Cooper's veto of S.B. 824 by a margin of 40 to 1. Four Democratic Representatives were excused absences and did not vote.
- 101. The following individual legislators in the House voted in favor of overriding Governor Cooper's veto of S.B. 824: Adams (R); J. Adcock (R); Arp (R); J. Bell (R); Bert Jones (R); Blackwell (R); Blust (R); Boles (R); Boswell (R); Bradford (R); Brawley (R); Brenden Jones (R); Brisson (R); Brody (R); Bumgardner (R); Burr (R); Clampitt (R); Cleveland (R); Collins (R); Conrad (R); Corbin (R); Davis (R); Destin Hall (R); Dixon (R); Dobson (R); Dollar (R); Duane Hall (D); Elmore (R); Faircloth (R); Ford (R); Fraley (R); Grange (R); K. Hall (R); Hardister (R); Hastings (R); Henson (R); Horn (R); Howard (R); Hurley (R); Iler (R); Johnson

- (R); Jordan (R); Lambeth (R); Lewis (R); Malone (R); McElraft (R); McGrady (R); McNeill (R); T. Moore (Speaker) (R); Muller (R); Murphy (R); Pittman (R); Potts (R); Presnell (R); Riddell (R); Rogers (R); Ross (R); Saine (R); Sauls (R); Setzer (R); Shepard (R); Speciale (R); Steinburg (R); Stevens (R); Stone (R); Strickland (R); Szoka (R); R. Turner (R); Warren (R); Watford (R); White (R); Yarborough (R).
- 102. The following individual legislators in the Senate voted in favor of overriding Governor Cooper's veto of S.B. 824: Alexander (R); Ballard (R); Barefoot (R); Barrett (R); Barringer (R); Berger (Chair) (R); Bishop (R); Britt (R); Brown (R); Cook (R); Daniel (R); J. Davis (R); Dunn (R); Edwards (R); Ford (D); Gunn (R); Harrington (R); Hise (R); Horner (R); B. Jackson (R); Krawiec (R); Lee (R); McInnis (R); Meredith (R); Newton (R); Rabin (R); Rabon (R); Sanderson (R); Sawyer (R); Tarte (R); Tillman (R); Tucker (R); Wells (R).
- 103. The following individual legislators in the House voted against overriding Governor Cooper's veto of S.B. 824: G. Adcock (D); Ager (D); Alexander (D); Autry (D); Ball (D); Beasley (D); Belk (D); L. Bell (D); Black (D); Brockman (D); Butler (D); Carney (D); Cunningham (D); Earle (D); Farmer-Butterfield (D); Floyd (D); Garrison (D); Gill (D); C. Graham (D); Harrison (D); Holley (D); Hunter (D); Insko (D); Jackson (D); John (D); Lucas (D); G. Martin (D); Meyer (D); Michaux (D); Montgomery (D); R. Moore (D); Morey (D); Pierce (D); Quick (D); Reives (D); B. Richardson (D); W. Richardson (D); Terry (D); Willingham (D); Wray (D).
- 104. The following individual legislators in the Senate voted against overriding Governor Cooper's veto of S.B. 824: Chaudhuri (D); Clark (D); D. Davis (D); Fitch (D); Foushee (D); J. Jackson (D); McKissick (D); Robinson (D); Smith (D); Van Duyn (D); Waddell (D); Woodard (D).

B. Legislative Defendants' Proposed and Agreed Stipulations

Legislative History of Senate Bill 824

1. In the November 2018 General Election, the people of North Carolina adopted a constitutional amendment ("Voter ID Amendment") that provides, "Voters offering tovote in person shall present photographic identification before voting. The General Assembly shall enact general laws governing the requirements of such photographic identification, which may

- include exceptions."
- 2. 2,049,121 voters voted for the Voter ID Amendment, while 1,643,983 voters votedagainst the Voter ID amendment.
- 3. 55.49% of voters voted for the Voter ID Amendment, while 44.51% of voters votedagainst the Voter ID Amendment.
- 4. On November 26, 2018, the Joint Elections Oversight Committee held a meeting inwhich implementation of the Voter ID Amendment was discussed.
- 5. Kim Westbrook Strach, at the time the Director of the State Board of Elections and Ethics, appeared before the Joint Elections Oversight Committee during its November 26, 2018 meeting.
- 6. In her appearance before the Joint Elections Oversight Committee on November 26,2018, Director Strach presented a PowerPoint presentation entitled, Prior EducationEfforts on Voter Identification Requirements (2014–16). ("Strach Presentation.")
- 7. On slides discussing "Review of 2016 primary data," the Strach Presentation states:
 - o "1,048 voters completed a Declaration of Reasonable Impediment indicating a 'reasonable impediment' prevented them from obtaining acceptable identification.Of these Reasonable Impediment voters, 864 ultimately counted."
 - o "1,248 voters did not present acceptable photo identification, or execute a Declaration of Reasonable Impediment, or return to the county office by the deadline after election night. These votes did not count."
 - o "2.7 million voters participated in the 2016 Primary."
- 8. On November 27, 2018, Senate Bill 824 ("S.B. 824") was filed in the North CarolinaSenate.
- 9. S.B. 824's primary sponsors were Senators Krawiec, Ford, and Daniel.

- 10. Senator Ford is an African American Democrat.
- 11. On November 28, 2018, the Senate adopted Senate Amendment A1 to S.B. 824 by a vote of 43-0.
- 12. DX42 Senate Amendment A1 to S.B. 824 was sponsored by Senator Ford.
- 13. On November 28, 2018, the Senate adopted Senate Amendment A10 to S.B. 824 by a vote of 43-0.
- 14. Senate Amendment A10 was sponsored by Senator McKissick, an African American Democrat.
- 15. On November 28, 2018, the Senate adopted Senate Amendment A11 to S.B. 824 by a vote of 40-3.
- 16. Amendment Senate A11 was sponsored by Senator Clark, an African AmericanDemocrat.
- 17. On November 28, 2018, S.B. 824 passed Second Reading in the Senate by a vote of 32-11.
- 18. Senators Clark, Don Davis, and Ford voted for S.B. 824 on Second Reading in the Senate.
- 19. Senator Don Davis is an African American Democrat.
- 20. On November 29, 2018, S.B. 824 passed Third Reading in the Senate by a vote of 30-10.
- 21. Senators Don Davis and Ford voted for S.B.824 on Third Reading in the Senate.
- 22. Senator Clark was an excused absence from the vote for S.B. 824 on Third Readingin the Senate.
- 23. On November 29, 2018, during Third Reading in the Senate, Senator McKissick stated, "I'd just like to say thank you to Senator Daniel and Senator Krawiec for their work on the bill and for being open and inclusive in listening to us on the other side of the aisle in trying to come up with something that is reasonable in terms of its approach. So I want to thank you for that effort. While I prefer the bill were not necessary, we have a

- constitutional amendment, so it is. So I think it's best that we try to move forward with it the best we can. Thank you."
- 24. On December 5, 2018, the House adopted House Amendment A1 to S.B. 824 by a vote of 86-14.
- 25. House Amendment A1 was sponsored by Representative Harrison, a Democrat.
- 26. On December 5, 2018, the House adopted House Amendment A2 to S.B. 824 by a vote of 102-4.
- 27. House Amendment A2 was sponsored by Representative Beasley, an African American Democrat.
- 28. On December 5, 2018, the House adopted House Amendment A4 to S.B. 824 by a vote of 106-1.
- 29. House Amendment A4 was sponsored by Representative Floyd, an African American Democrat.
- 30. On December 5, 2018, House Amendment A6 to S.B. 824 failed by a vote of 89-17.
- 31. House Amendment A6 was sponsored by Representative Warren, a white Republican.
- 32. On December 5, 2018, House Amendment A9 to S.B. 824 failed, by a vote of 89-17.
- 33. House Amendment A9 was sponsored by Representative Pittman, a white Republican.
- 34. On December 5, 2018, the House adopted House Amendment A11 to S.B. 824 by a vote of 106-0.
- 35. House Amendment A11 was sponsored by Representative Charles Graham, a Native American Democrat.
- 36. On December 5, 2018, House Amendment A12 to S.B. 824 failed

- by a vote of 95-9.
- 37. House Amendment A12 was sponsored by Representative Pittman, a white Republican.
- 38. Democrats sponsored a total of thirteen non-withdrawn amendments to S.B. 824.
- 39. Seven amendments to S.B. 824 sponsored by Democrats were adopted.
- 40. One Democrat-sponsored amendment to S.B. 824 that was not adopted, Senate Amendment A6, dealt with the use of free county board of elections voter IDs for non-voting purposes.
- 41. One Democrat-sponsored amendment to S.B. 824 that was not adopted, Senate Amendment A7, would have delayed the date on which free county board of elections voter IDs became available to voters.
- 42. One Democrat-sponsored amendment to S.B. 824 that was not adopted, Senate Amendment A8, would have extended early voting to include the last Saturday before an election. The General Assembly later enacted, and Governor Cooper signed into law, a bill extending one-stop early voting to include the last Saturday before an election.
- 43. One Democrat-sponsored amendment to S.B. 824 that was not adopted, HouseAmendment A13, would have added certain public assistance IDs to the list ofqualifying voter ID.
- 44. Republicans sponsored a total of 9 non-withdrawn amendments to S.B. 824.
- 45. Three amendments to S.B. 824 sponsored by Republican failed.
- 46. On December 5, 2018, S.B. 824 passed Second Reading in the House by a vote of 67-40.
- 47. Democratic Representatives Duane Hall and Goodman voted for S.B. 824 on SecondReading in the House.

- 48. On December 5, 2018, S.B. 824 passed Third Reading in the House by a vote of 67-40.
- 49. Democratic Representatives Duane Hall and Goodman voted for S.B. 824 on ThirdReading in the House.
- 50. On December 6, 2018, the Senate voted to concur in S.B. 824 as amended by the House by a vote of 25-7.
- 51. Senator Don Davis voted to concur in S.B. 824 as amended by the House.
- 52. Senators Ford and Clark were excused absences in the vote to concur in S.B. 824 as amended by the House.
- 53. On December 18, 2018, the Senate voted to override Governor Cooper's veto of S.B.824 by a vote of 33-12.
- 54. Democratic Senator Ford voted to override Governor Cooper's veto.
- 55. On December 18, 2018, the House voted to override Governor Cooper's veto of S.B.824 by a vote of 72-40.
- 56. Democratic Representative Duane Hall voted to override Governor Cooper's veto.
- 57. Representative Goodman was an excused absence on the vote to override GovernorCooper's veto.
- 58. Discussion and debate on S.B. 824 in committee or on the floor of the House lasted nearly thirteen hours.
- 59. Representative Bobbie Richardson proposed an amendment in the House that wouldhave added to the list of acceptable photo ID "An identification card issued by a branch, department, agency, or entity of the United States or this State for a government program of public assistance."
- 60. In opposition to Representative Bobbie Richardson's proposed amendment, Representative David Lewis stated, "We have listed formats that IDs need to conform to in order to be accepted in this bill. As you know, through the Supremacy Clause, we have no way to impose our standards on the federal government. Now, some

may say, but wait, you're taking military IDs and veterans IDs, and that's because those are uniformly published and established what they look like and how they work. There is no provision of this amendment that would even require the ID to have a picture. I would say that I'm very sympathetic and very concerned about the people that Representative Richardson speaks of, and that is why I believe the reasonable impediment language would provide a way for them to vote without having to go through the inconveniences that she referred to. So for that reason, I would ask you toplease vote down this amendment." ("Lewis Statement.")

- 61. In response to the Lewis Statement, Bobbie Richardson stated, "I understand your justification, and I accept the justification that you gave. But if we were to take federal out and just deal with state agencies, would that be more affable to your accepting this amendment?" ("Richardson Response.")
- 62. In response to the Richardson Response, Representative Lewis stated, "We certainly could consider that on third, if the state IDs were to conform the same way the otherstate IDs in the bill need to." ("Lewis Reply.")
- 63. In response to the Lewis Reply, Representative Richardson stated, "I appreciate that, and we will work with you."
- 64. After the exchanged recounted in the preceding four stipulations, there were no additional amendments to S.B. 824 proposed that would have added public assistance ID to the list of acceptable voter ID.
- 65. On March 13, 2019, the General Assembly passed S.B. 214.
- 66. On March 14, 2019, Governor Cooper signed S.B. 214 into law.
- 67. S.B. 214 amended S.B. 824 by postponing enforcement of voter ID to the 2020 elections while providing that "all implementation and educational efforts . . . shall continue."
- 68. On May 28, 2019, the General Assembly passed H.B. 646.
- 69. On June 3, 2019, Governor Cooper signed H.B. 646 into law.
- 70. H.B. 646 amended S.B. 824 to increase the time during which educational institutions and government employees can have their ID approved to qualify as voter ID and relaxed approval requirements.

- 71. On October 29, 2019, the General Assembly passed S.B. 683.
- 72. On November 6, 2019, Governor Cooper signed S.B. 683 into law.
- 73. S.B. 683 amended S.B. 824 by changing the reasonable impediment process for absentee ballots.
- 74. S.B. 683 appropriated additional funding to the State Board of Elections to implement voter ID.
- 75. On June 11, 2020, the General Assembly passed H.B. 1169 by a vote of 37-12 in the Senate and 105-14 in the House.
- 76. On June 12, 2020, Governor Cooper signed H.B. 1169 into law.
- 77. H.B. 1169 amended S.B. 824 by adding to the list of qualifying voter ID an identification card issued by a department, agency, or entity of the United States government or this State for a government program of public assistance.

Voting Data in North Carolina

- 78. 10,743 voters signed a form during the 2014 primary election acknowledging that they lacked acceptable voter identification under H.B. 589.
- 79. The State Board of Elections' Voter Outreach Team sent a mailing to 10,675 of the 10,743 voters who signed the form in 2014 acknowledging that they lacked acceptable voter identification under H.B. 589.
- 80. Of the voters who responded to the State Board of Elections' Voter Outreach Team's 2014 mailing regarding possession of acceptable voter identification under H.B. 589,95% indicated that they did in fact possess acceptable identification under H.B. 589.
- 81. The State Board of Elections generated a no-match analysis in February 2015 based on the voter registration and Department of Motor Vehicles customer data as of November 4, 2014 resulting in a list of 254,391 registered voters who could not be matched to a Department of Motor Vehicles identification card.

- 82. The State Board of Elections' Voter Outreach Team sent a mailing to 218,097 of the 254,391 registered voters who could not be matched to a Department of Motor Vehicles identification card in the February 2015 no-match analysis after removing from the original list voters who had since been removed due to list maintenance and those for whom the State Board was unable to validate an address.
- 83. Of the 20,580 voters who responded to the State Board of Elections' Voter Outreach Team's 2015 mailing regarding possession of acceptable voter identification under H.B. 589, 91% indicated that they did in fact possess acceptable identification under H.B. 589.
- 84. The State Board of Elections' Voter Outreach Team sent a mailing to 209,253 voter identified by Plaintiffs' expert in *NAACP v. McCrory* as voters who did not match toan approved H.B. 589 voter ID following a separate database analysis.
- 85. Of the 8,440 voters who responded to the State Board of Elections' Voter Outreach Team's mailing discussed in the preceding proposed stipulation, 76% indicated that they did in fact possess acceptable identification under H.B. 589.
- 86. In North Carolina's March 15, 2016 primary election, 2,332,045 votes were cast.
- 87. In North Carolina's March 15, 2016 primary election, 2,293,214 votes were cast in person.
- 88. In North Carolina's March 15, 2016 primary election, 2,371 voters cast a provisional ballot because they lacked acceptable photo identification.
- 89. In North Carolina's March 15, 2016 primary election, 1,048 voters completed a Declaration of Reasonable Impediment.
- 90. In North Carolina's March 15, 2016 primary election, of the 1,048 voters who completed a Declaration of Reasonable Impediment, at most 184 had their votes discounted by reason of lack of acceptable identification.

Miscellaneous

91. The states of Virginia, South Carolina, and Alabama were covered

jurisdictions under Section 5 of the Voting Rights Act when the Supreme Court decided *Shelby County v. Holder*, 579 U.S. 529 (2013).

II. Exhibits and Demonstratives

- 1. The Parties will exchange the demonstrative evidence that will be used in opening and closing statements and with witnesses, except for cross examination. Plaintiffs propose that such demonstratives be exchanged no later than 24 hours before the date the Party intends to use the demonstrative at trial. Legislative Defendants propose that such demonstratives be exchanged no later than 72 hours before the date the Party intends to use the demonstrative at trial.
- 2. The Parties will exchange summary exhibits, including citations to all underlying source exhibits, except for rebuttal or cross examination, no later than 7 days before the start of the Party's case-in-chief. For the purposes of this stipulation, the Defendants' case-in-chief is presumed to begin on April 19, 2021, the Monday of the second week of the scheduled trial.
- 3. Each party will serve its final intended order of witnesses no later than 10 days before the beginning of that Party's case-in-chief. For the purposes of this stipulation, the Defendants' case-in-chief is presumed to begin on April 19, 2021, the Monday of the second week of the scheduled trial.

4. Each Party will disclose, by exhibit number, the exhibits that will be used in its direct examination of a witness called in its case-inchief. Plaintiffs propose that such list of exhibits be disclosed no later than 9:00 a.m. on the day before the witness is scheduled to testify. Legislative Defendants propose that such list of exhibits be disclosed no later than 9:00 a.m. two days before the witness is scheduled to testify. This stipulation shall not apply to documents that prove necessary to refresh the witness's recollection or that may be used for impeachment.

III. Expert Testimony and Objections to Expert Testimony

- 1. The Parties agree that expert reports, affidavits, and rebuttal reports (however captioned or styled) disclosed by a Party's expert in this case shall be admissible at trial as testimony from that witness, provided the expert testifies at trial, without prejudice to a Party's right to examine the expert at trial. Any expert who testifies at trial may be cross-examined on any opinion disclosed in any report or affidavit disclosed by that expert in this case.
- In the event that the Parties' motions in limine have not been resolved prior to trial, the Parties agree and propose the following:

 (1) the Parties' motions in limine shall serve as standing objections to any expert testimony to which such motions apply without the need for any Party to reiterate its objections at trial;

provided, however, that (2) the Parties reserve the right to object at trial to the testimony of any expert witness on any other basis, including the form of the question.

EXHIBIT 2 Parties' Joint Exhibit List

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0001		NC SBOE County Office Information	-	-			
JX0002		Presentation by Kim Westbrook Strach, "Prior Education Efforts on Voter Identification Requirements (2014-2016)"	Holmes_00000773	Holmes_00000804			
JX0003		Post-Election Audit Report: General Election 2016	Holmes 00000596	Holmes 00000629			
JX0004	1/20/2021	Affidavit of Janet Thornton in Holmes et al. v. Moore et al.	-	-			
JX0005	12/14/2020	Affidavit of Kevin Quinn in Holmes et al. v. Moore et al.	-	-			
JX0006	1/25/2021	Rebuttal Report of Eitan Hersh, Ph.D. in Holmes et al. v. Moore et al.	-	-			
JX0007	6/18/2019	Affidavit of Karen Brinson Bell in Holmes et al. v. Moore et al.	Holmes_00000459	Holmes_00000466			
JX0008		08 NCAC 10B .0103 Voting Procedures	Holmes_00000467	Holmes_00000480			
JX0009	2019	2019 NCSBOE Public Voter ID Training Seminar Schedule	Holmes_00000481	Holmes_00000492			
JX0010		NC SBOE ID Card Machine Training	Holmes_00000493	Holmes_00000525			
JX0011	11/20/2020	Amended Notice of Deposition of Karen Brinson Bell	-	-			
JX0012	10/3/2018	Email from M. Coggins to J. Lawson et al. re: [External] FW: Number of Free ID Cards issued	Holmes SBOE POD 022536	Holmes SBOE POD 022537			
		Email from J. Lawson to N. Inman et al. re: [External] 11-26					
JX0013	11/25/2018	Attachment: Strach SBOE Presentation, "Prior Education Efforts on Voter Identification Requirements (2014-16)"	Holmes_SBOE_POD_024476	Holmes_SBOE_POD_024511			
JX0014	4/1/2013	April 2013 SBOE-DMV ID Analysis	Holmes SBOE POD 025867	Holmes SBOE POD 025875			
JX0015	11/1/2014	November 2014: State Board of Elections Analysis of Division of Motor Vehicles Data	Holmes SBOE POD 025876	Holmes SBOE POD 025886			
JX0016	6/12/2020	NC Session Law 2020-17, House Bill 1169	-	-			
JX0017	6/23/2020	Email from K. Bell to L. Berot et al. re: SEIMS Enhancements: Reprioritization	Holmes SBOE POD 083010	Holmes SBOE POD 083011			
JX0018	10/30/2019	Affidavit of Karen Brinson Bell in NC State Conference of the NAACP, et al. v. Cooper, et al.	HOLMES 00002880	HOLMES 00002895			
JX0019	2019	List of 2019 NCSBOE Public Voter ID Training Seminars (Locations and Attendees)	-	-			
	6/17/2019	Email from K. Love to P. Gannon re: Fwd: Correspondence from the State Board of Elections Office	Holmes_SBOE_POD_021898	Holmes_SBOE_POD_021899			
JX0020		Attachment: Letter from NC SBOE to House and Senate Appropriations Chairs					
JX0021	3/15/2019	Letter from NC SBOE to Co-Chairs and Committee Members	HOLMES 00003070	HOLMES 00003072			
JX0022	11/26/2019	NC SBOE Press Release, "UNC Student and Employee IDs Approved for Voting"	-	-			
JX0023	3/11/2018	Documented Cases of Voter Fraud in North Carolina	-	_			
JX0024	11/22/2019	2015-2019 NCSBE Referred Cases	_	_			
JX0025	6/18/2019	Affidavit of Keegan Callanan in Holmes et al. v. Moore et al.	Holmes 00000554	Holmes 00000595			
JX0026	12/14/2020	Affidavit of Keegan Callanan in Holmes et al. v. Moore et al.	-	-			
JX0027	1/20/2021	Affidavit of Keegan Callanan in Holmes et al. v. Moore et al.	-	-			
JX0028	-	National Conference of State Legislatures, "Voter Identification Requirements Voter ID Laws"	-	-			
JX0029	8/25/2020	National Conference of State Legislatures, "Voter Identification Requirements Voter ID Laws"	-	-			
JX0030	2/18/2020	Holmes et al. v. Moore et al. Opinion In the Court of Appeals of North Carolina No. COA19-762	-	-			
JX0031	12/14/2020	Expert Report of Sabra Faires in Holmes et al. v. Moore et al.	-	-			
JX0032	6/30/2017	General Assembly of North Carolina Session Resolution 2017-12 - Senate Joint Resolution 686	HOLMES_00006452	HOLMES_00006455			
JX0033	11/29/2018	North Carolina General Assembly - North Carolina House of Representatives - 3rd Reading	-	-			
JX0034							
JX0035	12/5/2018	The Charlotte Observer article by Joel Ford, "I'm a black Democrat and I backed GOP's voter ID"	HOLMES_00000743	HOLMES_00000746			
JX0036	6/17/2019	Affidavit of M.V. Hood III in Holmes et al. v. Moore et al.	Holmes_00001013	Holmes_00001063			
JX0037	6/19/2012	Declaration of M.V. Hood III in State of South Carolina v. United States of America et al.	Holmes_00001064	Holmes_00001097			
JX0038		Affidavit of Kevin Quinn, Ph.D., dated May 13, 2019, with supporting documentation					

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292							
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes			
JX0039	12/14/2020	Affidavit of M.V. Hood III in Holmes et al. v. Moore et al.	-	-				
JX0040		Brian Neesby LinkedIn Page	-	-				
JX0041	Aug-19	Neesby No-Match Analysis, August 2019	-	-				
JX0042	2/9/2011	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis	-	-				
JX0043	2/16/2011	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis	-	-				
JX0044	2019	NCSBOE Tracker of Voter Responses to No-Match List Mailings, 2019	-	-				
JX0045	2/9/2011	"SBOE & NCDMV Voter Registration Database ID Analysis" Memo	-	-				
	5/1/2019	Email from B. Neesby to P. Gannon et al. re: [External] updated no ID match list? Attachment: November 2014: State Board of Elections Analysis of Division of Motor Vehicles Data	Holmes_SBOE_POD_047897	Holmes_SBOE_POD_047918				
JX0046		Attachment: April 2013 SBOE-DMV ID Analysis						
JX0047	1/8/2018	Email from B. Neesby to M. Coggins re: [External] RE: NC Voters that don't have ID	Holmes_SBOE_POD_023059	Holmes_SBOE_POD_023063				
JX0048	1/7/2015	Email from B. Neesby to J. Lawson et al. re: No ID List	-	-				
JX0049	6/19/2015	Email from B. LiVecchi to B. Neesby et al. re: New State BOE Mailing for Voter ID	-	-				
JX0050	12/14/2020	Affidavit of Kimberly Westbrook Strach in Holmes et al. v. Moore et al.	-	-				
JX0051	1/20/2021	Affidavit of Kimberly Westbrook Strach in Holmes et al. v. Moore et al.	-	-				
JX0052	8/11/2020	Declaration of Kimberly Westbrook Strach in <i>League of Women Voters of Virginia et al.</i> v. <i>Virginia State Board of Elections et al.</i>	-	-				
JX0053	3/19/2013	Emails from Sponsors of H.B. 589 to SBOE re: Data on Photo ID, One-Stop and Provisional Voting by Race, Age, Gender	-	-				
JX0054	3/5/2013	Email from V. Degraffenreid to G. Bartlett, J. McLean and M. Burris attaching January 2013 DMV ID Matching Report and March 2013 Supplemental Report	-	-				
JX0055	3/11/2013	State Board of Elections Memorandum & Attachments to House Elections Committee and House Appropriations Subcommittee on General Government: Documented Cases of Voter Fraud in North Carolina	-	-				
JX0056	3/12/2013	Email from V. Degraffenreid to Representatives Warren, Murry, and Samuelson re Request	-	-				
JX0057	3/13/2013	Email from G. Bartlett to S. Mooneyham re Supplemental Tables for Representative Warren	-	-				
JX0058	8/19/2020	Declaration of Kimberly Westbrook Strach in DCCC et al. v. Paul Zirlax et al.	-	-				
JX0059	6/18/2019	Affidavit of Janet R. Thornton in Holmes et al. v. Moore et al.	Holmes_00000829	Holmes_00000913				
JX0060	5/18/2015	Expert Report of Kevin M. Quinn, dated May 18, 2015, in North Carolina State Conference of the NAACP v. McCrory	Holmes_00000914	Holmes_00000966				
JX0061	5/24/2015	Surrebuttal Report of Charles Stewart III in <i>United States of America</i> v. <i>The State of North Carolina, et al.</i>	Holmes_00000967	Holmes_00001012				
JX0062	10/20/2020	Affidavit of Cindy L. Barr (Non-Party Appalachian State University)	ASU_00000001	ASU_00000005				
JX0063	10/20/2020	Appalachian State University Student Directory Data	ASU_00000006	ASU_00000006				
JX0064	10/8/2020	Brevard College Student Directory Data	BC_00000001	BC_0000001				
JX0065	9/24/2020	Beaufort County Community College Student Directory Data	BCCC_00000001	BCCC_00000001				
JX0066	9/24/2020	Beaufort County Community College ID Card Procedures	BCCC_00000002	BCCC_00000002				
JX0067	9/24/2020	Beaufort County Community College Demographic Data	BCCC_00000003	BCCC_00000003				
JX0068	9/24/2020	Affidavit of Davis R. Loope In Response to Non-Party Subpoena Issued to Beaufort Community College	BCCC_00000004	BCCC_00000006				
JX0069	11/13/2020	Beaufort County Community College Employee Directory Data	BCCC_00000007	BCCC_00000007				
JX0070	10/16/2020	Bennett College Student Directory Data	BENNETT_00000001	BENNETT_00000001				
JX0071	10/7/2020	Cleveland Community College Student Directory Data	CCC_00000001	CCC_00000001				
JX0072	10/7/2020	Affidavit of Andy Gardner In Response to Non-Pary Subpoena Issued to Cleveland Community College	CCC_00000002	CCC_00000004				

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0073	11/19/2020	Cleveland Community College Employee Directory Data	CCC_00000005	CCC_00000005			
JX0074	10/15/2020	Affidavit of Elizabeth Edwards Holland In Response to Non-Party Subpoena Issued to Caldwell Community College and Technical Institute	CCCTI_00000001	СССТІ_00000006			
JX0075	10/15/2020	Caldwell Community College and Technical Institute Student Directory Data	CCCTI_00000007	CCCTI_00000007			
JX0076	11/13/2020	Caldwell Community College and Technical Institute Employee Directory Data	CCCTI_00000008	CCCTI_00000008			
JX0077	9/25/2020	Carolinas College of Health Sciences Student Directory Data	CCHS_00000001	CCHS_00000001			
JX0078	5/15/2014	Declaration of Peyton McCrary	-	-			
JX0079	9/25/2020	Carolinas College of Health Sciences Student Directory Data	CCHS_00000002	CCHS_00000002			
JX0080	9/25/2020	Letter from P. Banks to J. Loperfido re: Public Records Request - Carolinas College of Health Sciences	CCHS_00000003	CCHS_00000003			
JX0081	9/25/2020	Carolinas College of Health Sciences Policy and Procedure re: Orientation and Onboarding for Students	CCHS_00000004	CCHS_00000005			
JX0082	10/7/2020	Affidavit of Sonya Johnson In Response to Non-Party Subpoena Issued to Cape Fear Community College	CFCC_00000001	CFCC_00000267			
JX0083	10/7/2020	Cape Fear Community College Student Directory Data	CFCC_00000268	CFCC_00000268			
JX0084	10/7/2020	Cape Fear Community College Student Directory Data	CFCC 00000269	CFCC 00000269			
JX0085	5/29/2020	Chowan University Student Directory Data	Chowan_University_00000001	Chowan_University_00000001			
JX0086	5/29/2020	Chowan University Student Aid Handbook Excerpt	Chowan_University_00000002	Chowan_University_00000002			
JX0087	10/24/2019	Email from D. Moore to VoterID@ncsbe.gov re: Chowan University - Student ID Approval Form	Chowan_University_00000003	Chowan_University_00000009			
JX0088	10/2/2020	Central Piedmont Community College Student Directory Data	CP_HOLMES_000001	CP_HOLMES_000001			
JX0089	10/2/2020	Central Piedmont Community College, "How to Get Your ID Card During Coronavirus (COVID-19)"	CP_HOLMES_000002	CP_HOLMES_000005			
JX0090	10/2/2020	Central Piedmont Community College Enrollment Bulletin	CP_HOLMES_000006	CP_HOLMES_000006			
JX0091	10/2/2020	Affidavit of Mike Whiteman In Response to Non-Party Subpoena Issued to Central Piedmont Community College	CP_HOLMES_000007	CP_HOLMES_000009			
JX0092	11/13/2020	Central Piedmont Community College Employee Directory Data	CP_HOLMES_000010	CP_HOLMES_000010			
JX0093	11/13/2020	Central Piedmont Community College Employee Directory Data	CP_HOLMES_000011	CP_HOLMES_000011			
JX0094	9/24/2020	Davidson College Student Directory Data	DAVIDSON_HOLMES_000001	DAVIDSON_HOLMES_000001			
JX0095	9/24/2020	Davidson College Student Directory Data (Fall 2019)	DAVIDSON_HOLMES_000002	DAVIDSON_HOLMES_000002			
JX0096	9/24/2020	Davidson College Student Directory Data (Spring 2020)	DAVIDSON_HOLMES_000003	DAVIDSON_HOLMES_000003			
JX0097	9/24/2020	Davidson College Statement of Photo Identification Process	DAVIDSON_HOLMES_000004	DAVIDSON_HOLMES_000004			
JX0098	9/24/2020	Duke University Student Directory Data	DU_0000001	DU_00000001			
JX0099	9/24/2020	Duke University Student Directory Data	DU_00000002	DU_00000002			
JX0100	5/1/2014	HB 589 Bill History (2013)	-	-			
JX0101	9/23/2020	Affidavit of Michael Jordan In Response to Non-Party Subpoena Issued to Edgecombe Community College	ECC_00000001	ECC_00000003			
JX0102	9/23/2020	Edgecombe Community College Student Directory Data	ECC_0000004	ECC_0000004			
JX0103	9/23/2020	Edgecombe Community College Student Count By Race	ECC_0000005	ECC_0000005			
JX0104	11/13/2020	Edgecombe Community College Employee Directory Data	ECC_0000006	ECC_0000006			
JX0105	10/9/2020	Affidavit of Althea Riddick In Response to Non-Party Subpoena Issued to Elizabeth City State University	ECSU_00000001	ECSU_00000003			
JX0106	10/9/2020	Elizabeth City State University Student Directory Data	ECSU_00000004	ECSU_00000004			
JX0107	10/9/2020	Affidavit of Angela R. Anderson In Response to Non-Party Subpoena Issued to East Carolina University	ECU_0000001	ECU_00000004			
JX0108	10/9/2020	East Carolina University Student Directory Data	ECU 00000005	ECU 00000005			
JX0109	9/23/2020	Letter from J. Townsend to J. Loperfido et al. re: Jabari Holmes et al. v. Timothy Moore et al. Subpoenas to Meredith College, Elon University, and William Peace University	EU_00000001	EU_0000002			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0110	9/23/2020	Elon University Student Directory Data (2019)	EU_00000003	EU_0000003			
JX0111	9/23/2020	Elon University Student Directory Data (2020)	EU_0000004	EU_0000004			
JX0112	10/13/2020	Affidavit of Sarah Baker In Response to Non-Party Subpoena Issued to Fayetteville State University	FSU_00000001	FSU_00000003			
JX0113	3/15/2019	NC SBOE List of Approved Student ID Cards	FSU_00000004	FSU_00000007			
JX0114	10/13/2020	Fayetteville State University Student Directory Data	FSU_00000008	FSU_00000008			
JX0115	9/25/2020	Affidavit of Christopher Y. Pearce In Response to Non-Party Subpoena Issued to Forsyth Technical Community College	FTCC_00000001	FTCC_00000003			
JX0116	9/25/2020	Forsyth Technical Community College Student Directory Data	FTCC 00000004	FTCC 00000004			
JX0117	7/25/2013	7/25/13 House Floor Session, Transcript of Proceedings	-	-			
JX0118	9/25/2020	Forsyth Technical Community College, "Identity Verification Procedure"	FTCC 00000005	FTCC 00000007			
JX0119	11/13/2020	Forsyth Technical Community College Employee Directory Data	FTCC 00000008	FTCC 00000008			
JX0120	6/15/2020	Gardner-Webb University Application for Admission	Gardner- Webb University 00000001	Gardner- Webb University 00000005			
JX0121	6/15/2020	Gardner-Webb University Student Directory Data	Gardner- Webb_University_00000006	Gardner- Webb_University_00000006			
JX0122	6/15/2020	Declaration of Dr. Jeffrey Tubbs in Response to Non-Party Subpoena Issued to Gardner-Webb University	Gardner- Webb_University_00000007	Gardner- Webb_University_00000010			
JX0123	6/15/2020	Letter from S. Serck to J. Loperfido re: Gardner-Webb University Response to Subpoena Holmes et al. vs. Moore et al.	Gardner- Webb_University_00000011	Gardner- Webb_University_00000014			
JX0124	6/15/2020	NC SBOE Student ID Approval Form 2019-2020 for Gardner-Webb University	Gardner- Webb_University_00000015	Gardner- Webb_University_00000020			
JX0125	10/9/2020	Affidavit of Dr. Michael Elam in Response to Non-Party Subpoena Issued to Halifax Community College	HCC_0000001	HCC_00000003			
JX0126	10/9/2020	Halifax Community College Student Directory Data	HCC_0000004	HCC_00000004			
JX0127	10/9/2020	Halifax Community Fall 2020 Racial Demographic of Students	HCC_00000005	HCC_00000005			
JX0128	10/9/2020	Halifax Community College "Fall 2020" ID Badge Log Sheet	HCC_0000006	HCC_00000047			
JX0129	11/13/2020	Halifax Community College Employee Directory Data	HCC_00000048	HCC_00000048			
JX0130	9/28/2020	Affidavit of Sandra Lackner in Response to Non-Party Subpoena Issued to Isothermal Community College	ICC_0000001	ICC_00000003			
JX0131	9/28/2020	Isothermal Community College Student Directory Data	ICC_0000004	ICC_0000063			
JX0132	9/28/2020	Isothermal Community College Student Directory Data	ICC_0000065	ICC_0000065			
JX0133	10/8/2020	Johnson C. Smith University Student Directory Data	JCSU_00000001	JCSU_00000001			
JX0134	8/7/1965	Determination of the Attorney General Pursuant to Section 4(b)(1) of the Voting Rights Act of 1965 (30 Federal Register 9897)	-	-			
JX0135	1/4/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 19)	-	-			
JX0136	3/2/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 3317)	-	-			
JX0137	3/29/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 5080)	-	-			
JX0138	10/30/2019	Livingstone College Responses to Plaintiffs' Request For Production	LC_0000001	LC_00000002			
JX0139	10/30/2019	Livingstone College Responses to Plaintiffs' Request For Production Certificate of Service	LC_00000003	LC_00000003			
JX0140	10/30/2019	Livingstone College Student Directory Data	LC_00000004	LC_00000037			
JX0141	10/30/2019	Livingstone College Summer 2019 Bridge Program	LC_0000038	LC_00000040			
JX0142	10/30/2019	Email from E. Colon re: Required Voter ID Information for College and University Students	LC_00000041	LC_00000051			
JX0143	2/6/2019	Letter from T. Fitzgerald to Livingstone College re: NC SBOE ID Approvals	LC_00000052	LC_00000088			
JX0144	11/1/2019	NC SBOE Letter Approving IDs for Lees-McRae College	LMC_0000001	LMC_00000003	·		
JX0145	9/25/2020	Response of Non-Party Lees-McRae College to Document Requests	LMC_00000004	LMC_00000007			
JX0146	9/25/2020	Lees-McRae College Student Directory Data	LMC_00000008	LMC_0000008			

Joint		Holmes et al. v. Moore et al., Case No. 1	19 CA2 12525		
Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes
JX0147	10/8/2019	Mars Hill University NC SBOE Student ID Approval Form 2019-2020	1	Mars_Hill_University_0000000 1	
JX0148	6/12/2020	Mars Hill University Student ID Photo	Mars_Hill_University_0000000 2	Mars_Hill_University_0000000 2	
JX0149	6/12/2020	Mars Hill University Enrollment Data	3	Mars_Hill_University_0000000 5	
JX0150	6/12/2020	Mars Hill University Student Directory Data	6	Mars_Hill_University_0000000 6	
JX0151	11/1/2019	NC SBOE Letter Approving IDs for Mars Hill University	7	Mars_Hill_University_0000000 8	
JX0152	6/12/2020	Letter from T. Floyd to J. Loperfido re: Subpoena for Holmes et al v. Moore et al., 18*cvs* 15292, Wake Cty Sup. Ct.	9	Mars_Hill_University_0000001 1	
JX0153	6/12/2020	Mars Hill University Student Directory Data	2	Mars_Hill_University_0000001 2	
JX0154	6/12/2020	Mars Hill University Student Directory Data	Mars_Hill_University_0000001	Mars_Hill_University_0000001 3	
JX0155	-	NC SBOE No-Match Voter List	Holmes_SBOE_POD_004024	Holmes_SBOE_POD_004024	
JX0156	3/15/2016	Help Referral - Deborah Russell Cobb	Holmes_SBOE_POD_012440	Holmes_SBOE_POD_012442	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.
JX0157	3/15/2016	Reasonable Impediment Declaration - Alan Lee Altrer	Holmes_SBOE_POD_012444	Holmes_SBOE_POD_012444	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.
JX0158	3/15/2016	Reasonable Impediment Declaration - Katrina Annette Ross	Holmes_SBOE_POD_012445	Holmes_SBOE_POD_012447	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.
JX0159	3/15/2016	Reasonable Impediment Declaration - Ardna May Gambill	Holmes_SBOE_POD_012449	Holmes_SBOE_POD_012449	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0160	3/15/2016	Reasonable Impediment Declaration - Tiffany Nicole Reece	Holmes_SBOE_POD_012450	Holmes_SBOE_POD_012477	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0161	3/31/2016	Memo from Kellie Harris Hopkins re: Beaufort County Reasonable Impediments for the March 15, 2016 Primary Election	Holmes_SBOE_POD_012478	Holmes_SBOE_POD_012481	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0162	3/15/2016	Reasonable Impediment Declaration - Essie Mae Capehart	Holmes_SBOE_POD_012482	Holmes_SBOE_POD_012483	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0163	3/15/2016	Reasonable Impediment Declaration - Pamela Charlene Brady	Holmes_SBOE_POD_012484	Holmes_SBOE_POD_012501	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0164	3/15/2016	Reasonable Impediment Declaration - Adalgiso Joseph Mancini	Holmes_SBOE_POD_012511	Holmes_SBOE_POD_012522	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0165	3/15/2016	Reasonable Impediment Declaration - Calvin O'Neal Allen	Holmes_SBOE_POD_012523	Holmes_SBOE_POD_012534	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0166	3/15/2016	Reasonable Impediment Declaration - Gregory Shaun Keller	Holmes_SBOE_POD_012535	Holmes_SBOE_POD_012546	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0167	3/15/2016	Reasonable Impediment Declaration - Edward Franklin Garmon	Holmes_SBOE_POD_012547	Holmes_SBOE_POD_012552	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0168	3/15/2016	Reasonable Impediment Declaration - Kaitlyn Annyce Powell	Holmes_SBOE_POD_012553	Holmes_SBOE_POD_012563	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0169	3/15/2016	Reasonable Impediment Declaration - Derek Lynn Davis	Holmes_SBOE_POD_012564	Holmes_SBOE_POD_012564	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0170	3/15/2016	Reasonable Impediment Declaration - Anthony Crihfield	Holmes_SBOE_POD_012565	Holmes_SBOE_POD_012570	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0171	3/15/2016	Reasonable Impediment Declaration - Jessica Marie Easley	Holmes_SBOE_POD_012571	Holmes_SBOE_POD_012573	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0172	3/15/2016	Reasonable Impediment Declaration - Dorothy Hoke Isenhour	Holmes_SBOE_POD_012574	Holmes_SBOE_POD_012587	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0173	3/15/2016	Reasonable Impediment Declaration - Joyce Oldham Adcock	Holmes_SBOE_POD_012588	Holmes_SBOE_POD_012607	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0174	3/15/2016	Reasonable Impediment Declaration - Taylor Grace Beasley	Holmes_SBOE_POD_012608	Holmes_SBOE_POD_012608	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0175	3/15/2016	Reasonable Impediment Declaration - William Nelson Brooks	Holmes_SBOE_POD_012609	Holmes_SBOE_POD_012614	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0176	3/15/2016	Reasonable Impediment Declaration - Tashala Jamel Gilliam	Holmes_SBOE_POD_012615	Holmes_SBOE_POD_012615	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0177	3/15/2016	Reasonable Impediment Declaration - James Martin Fleishman	Holmes_SBOE_POD_012616	Holmes_SBOE_POD_012647	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0178	3/15/2016	Reasonable Impediment Declaration - Tori Faye Eller	Holmes_SBOE_POD_012648	Holmes_SBOE_POD_012649	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0179	3/15/2016	Reasonable Impediment Declaration - Maira Betsy Morell	Holmes_SBOE_POD_012650	Holmes_SBOE_POD_012650	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0180	7/23/2013	7/23/13 Senate Debate on HB 589 VIVA/Election Reform, Rules Meeting					
JX0181	3/15/2016	Reasonable Impediment Declaration - John M. McKiver	Holmes_SBOE_POD_012651	Holmes_SBOE_POD_012652	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0182	3/15/2016	Reasonable Impediment Declaration - Darius Jacobi Alston	Holmes_SBOE_POD_012652	Holmes_SBOE_POD_012686	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0183	3/15/2016	Reasonable Impediment Declaration - Arielle Rebecca Kahn	Holmes_SBOE_POD_012687	Holmes_SBOE_POD_012720	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0184	3/15/2016	Reasonable Impediment Declaration - Kelly Lynn Vittetoe	Holmes_SBOE_POD_012721	Holmes_SBOE_POD_012745	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0185	3/15/2016	Reasonable Impediment Declaration - Addison Ricknan Howenstine	Holmes_SBOE_POD_012746	Holmes_SBOE_POD_012789	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0186	3/15/2016	Reasonable Impediment Declaration - Patricia Delores Cooper	Holmes_SBOE_POD_012790	Holmes_SBOE_POD_012822	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0187	3/15/2016	Reasonable Impediment Declaration - James A. Bobbitt	Holmes_SBOE_POD_012823	Holmes_SBOE_POD_012829	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0188	3/15/2016	Reasonable Impediment Declaration - Lawrence L. Bridget	Holmes_SBOE_POD_012830	Holmes_SBOE_POD_012840	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0189	3/15/2016	Reasonable Impediment Declaration - Denise Courtney Love	Holmes_SBOE_POD_012841	Holmes_SBOE_POD_012845	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0190	3/15/2016	Reasonable Impediment Declaration - John Paul Doherty	Holmes_SBOE_POD_012846	Holmes_SBOE_POD_012848	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0191	3/15/2016	Reasonable Impediment Declaration - Esther Williams Barfield	Holmes_SBOE_POD_012849	Holmes_SBOE_POD_012859	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0192	3/15/2016	Reasonable Impediment Declaration - Emma M. Edwards	Holmes_SBOE_POD_012860	Holmes_SBOE_POD_012933	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0193	3/15/2016	Reasonable Impediment Declaration - Jackquelyn Touche Lawson	Holmes_SBOE_POD_012934	Holmes_SBOE_POD_012942	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0194	3/15/2016	Reasonable Impediment Declaration - John Marshall Hood	Holmes_SBOE_POD_012943	Holmes_SBOE_POD_012946	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0195	3/15/2016	Reasonable Impediment Declaration - Sylvester Avon King	Holmes_SBOE_POD_012946	Holmes_SBOE_POD_012948	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0196	3/15/2016	Reasonable Impediment Declaration - Shirley Goodman Fairley	Holmes_SBOE_POD_013004	Holmes_SBOE_POD_013011	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0197	3/15/2016	Reasonable Impediment Declaration - Naomi R. Lee	Holmes_SBOE_POD_013012	Holmes_SBOE_POD_013026	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0198	3/15/2016	Reasonable Impediment Declaration - Irene Jones Weston	Holmes_SBOE_POD_013027	Holmes_SBOE_POD_013028	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0199	3/15/2016	Reasonable Impediment Declaration - Wanda Jean White	Holmes_SBOE_POD_013029	Holmes_SBOE_POD_013035	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0200	3/15/2016	Reasonable Impediment Declaration - Ralph Edward Strunks	Holmes_SBOE_POD_013036	Holmes_SBOE_POD_013036	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0201	3/15/2016	Reasonable Impediment Declaration - Dolores T. Foster	Holmes_SBOE_POD_013037	Holmes_SBOE_POD_013037	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0202	3/15/2016	Reasonable Impediment Declaration - Madelyn Lee Gibson	Holmes_SBOE_POD_013038	Holmes_SBOE_POD_013043	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0203	3/15/2016	Reasonable Impediment Declaration - David F. Wolfe	Holmes_SBOE_POD_013044	Holmes_SBOE_POD_013050	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0204	3/15/2016	Reasonable Impediment Declaration - Olivia Council Higgs	Holmes_SBOE_POD_013051	Holmes_SBOE_POD_013053	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0205	3/15/2016	Provisional Voting Applications	Holmes_SBOE_POD_013054	Holmes_SBOE_POD_013269	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0206	3/15/2016	Reasonable Impediment Declaration - Alvis P. Goforth	Holmes_SBOE_POD_013270	Holmes_SBOE_POD_013271	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0207	3/15/2016	Reasonable Impediment Declaration - Likisha Cherry Cole	Holmes_SBOE_POD_013272	Holmes_SBOE_POD_013282	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0208	3/15/2016	Reasonable Impediment Declaration - Briana K.A. Gillette	Holmes_SBOE_POD_013283	Holmes_SBOE_POD_013283	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		
JX0209	3/15/2016	Reasonable Impediment Declaration - Clarence Russ	Holmes_SBOE_POD_013284	Holmes_SBOE_POD_013311	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0210	3/15/2016	Reasonable Impediment Declaration - Dyana O. Scholz	Holmes_SBOE_POD_013312	Holmes_SBOE_POD_013312	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0211	3/15/2016	Reasonable Impediment Declaration - Gracie Daye Bynum	Holmes_SBOE_POD_013313	Holmes_SBOE_POD_013313	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0212	3/15/2016	Reasonable Impediment Declaration - Jo Anne Adams	Holmes_SBOE_POD_013314	Holmes_SBOE_POD_013317	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0213	3/15/2016	Provisional Voters List	Holmes_SBOE_POD_013318	Holmes_SBOE_POD_013342	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0214	3/15/2016	Reasonable Impediment Declaration - Benjamin Lee Cox	Holmes_SBOE_POD_013343	Holmes_SBOE_POD_013345	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0215	3/15/2016	Reasonable Impediment Declaration - Hope Whitman Rice	Holmes_SBOE_POD_013346	Holmes_SBOE_POD_013352	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0216	3/15/2016	Reasonable Impediment Declaration - Katonya K. Harvey	Holmes_SBOE_POD_013353	Holmes_SBOE_POD_013355	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0217	3/15/2016	Reasonable Impediment Declaration - David Marshall Wilson	Holmes_SBOE_POD_013356	Holmes_SBOE_POD_013365	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0218	3/15/2016	Reasonable Impediment Declaration - Carrie E. Gorham	Holmes_SBOE_POD_013366	Holmes_SBOE_POD_013372	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0219	3/15/2016	Reasonable Impediment Declaration - Betty Bishop	Holmes_SBOE_POD_013373	Holmes_SBOE_POD_013385	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0220	3/15/2016	Reasonable Impediment Declaration - Larry Wayne Williams	Holmes_SBOE_POD_013399	Holmes_SBOE_POD_013401	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0221	3/15/2016	Reasonable Impediment Declaration - Katina Lynn Oxendine	Holmes_SBOE_POD_013402	Holmes_SBOE_POD_013415	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0222	3/15/2016	Reasonable Impediment Declaration - Joan Marie Seagraves	Holmes_SBOE_POD_013416	Holmes_SBOE_POD_013417	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0223	3/15/2016	Reasonable Impediment Declaration - Essie Mae Foxx	Holmes_SBOE_POD_013418	Holmes_SBOE_POD_013425	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0224	3/15/2016	Reasonable Impediment Declaration - Marrie Cunningham Wall	Holmes_SBOE_POD_013426	Holmes_SBOE_POD_013427	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0225	3/15/2016	Reasonable Impediment Declaration - Russell Lamont Newkirk	Holmes_SBOE_POD_013428	Holmes_SBOE_POD_013428	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0226	3/15/2016	Reasonable Impediment Declaration - Samuel Dale Poplin	Holmes_SBOE_POD_013429	Holmes_SBOE_POD_013451	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0227	3/15/2016	Reasonable Impediment Declaration - Tiffany Tucker	Holmes_SBOE_POD_013452	Holmes_SBOE_POD_013461	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0228	3/15/2016	Reasonable Impediment Declaration - Samuel Keven Spires	Holmes_SBOE_POD_013462	Holmes_SBOE_POD_013466	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0229	3/15/2016	Reasonable Impediment Declaration - Brittant Shanae Sykes	Holmes_SBOE_POD_013467	Holmes_SBOE_POD_013467	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0230	3/15/2016	Reasonable Impediment Declaration - Loyd James Axson	Holmes_SBOE_POD_013468	Holmes_SBOE_POD_013480	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0231	3/15/2016	Reasonable Impediment Declaration - Lillian Fuller	Holmes_SBOE_POD_013481	Holmes_SBOE_POD_013490	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0232	3/15/2016	Reasonable Impediment Declaration - Akilah Shani Milton	Holmes_SBOE_POD_013491	Holmes_SBOE_POD_013725	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0233	3/15/2016	Reasonable Impediment Declaration - Barbara Harrison Sahue	Holmes_SBOE_POD_013726	Holmes_SBOE_POD_013741	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0234	3/15/2016	Reasonable Impediment Declaration - Kristel Lantz Kellner	Holmes_SBOE_POD_013742	Holmes_SBOE_POD_013776	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0235	3/15/2016	Reasonable Impediment Declaration - Naoma Choate	Holmes_SBOE_POD_013777	Holmes_SBOE_POD_013782	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0236	3/15/2016	Reasonable Impediment Declaration - Robert Taylor Casstevens	Holmes_SBOE_POD_013783	Holmes_SBOE_POD_013784	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	
JX0237	3/15/2016	Reasonable Impediment Declaration - Anna Mae Mcloury	Holmes_SBOE_POD_013785	Holmes_SBOE_POD_013789	Parties agree the document is admissible as a record of a regularly conducted activity, but reserve the right to object to this document being admitted for the truth of its contents.	

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0238	9/25/2020	Letter from J. Townsend to J. Loperfido et al. re: Holmes et al. v. Moore et al. Response to Subpoena to Meredith College, Elon University, and William Peace University	MC_0000001	MC_00000002		
JX0239	9/25/2020	Meredith College Student Directory Data	MC_0000003	MC_0000003		
JX0240	10/27/2020	Affidavit of Jacqueline Powers in Response to Non-Party Subpoena Issued to North Carolina Agricultural and Technical State University in Holmes et al. v. Moore et al.	NCATSU_00000001	NCATSU_00000003		
JX0241	10/27/2020	Affidavit of Kelly Rowett James in Response to Non-Party Subpoena Issued to North Carolina Agricultural and Technical State University in Holmes et al. v. Moore et al.	NCATSU_00000004	NCATSU_00000005		
JX0242	10/27/2020	North Carolina Agricultural and Technical State University Student Directory Data	NCATSU 00000006	NCATSU 00000006		
JX0243	11/16/2020	Affidavit of Dr. Jerome Goodwin In Response to Non-Party Subpoena Issued to North Carolina Central University in Holmes et al. v. Moore et al.	NCCU_00000001	NCCU_0000008		
JX0244	11/16/2020	North Carolina Central University Student Directory Data	NCCU_00000009	NCCU_00000009		
JX0245	11/16/2020	North Carolina Department of Health and Human Services Employee Data	NCDHHS_00000001	NCDHHS_00000001		
JX0246	11/2/2020	North Carolina Department of Transportation Driver's License or Identification Number Data - Residential Address File	NCDOT_00000001	NCDOT_00000001		
JX0247	10/26/2020	North Carolina Department of Transportation Address 1 Data - Residential Address File	NCDOT_00000002	NCDOT_00000002		
JX0248	10/26/2020	North Carolina Department of Transportation Address 2 Data - Residential Address File	NCDOT_00000003	NCDOT_00000003		
JX0249	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number Data - Mailing Address File	NCDOT_00000004	NCDOT_00000004		
JX0250	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number Data - Residential Address History File	NCDOT_00000005	NCDOT_00000005		
JX0251	10/26/2020	North Carolina Department of Transportation Address 1 Data - Residential Address History File	NCDOT_00000006	NCDOT_00000006		
JX0252	10/26/2020	North Carolina Department of Transportation Address 2 Data - Residential Address History File	NCDOT_00000007	NCDOT_00000007		
JX0253	10/26/2020	North Carolina Department of Transportation City Data - Residential Address History File	NCDOT_00000008	NCDOT_00000008		
JX0254	10/26/2020	North Carolina Department of Transportation State Data - Residential Address History File	NCDOT_00000009	NCDOT_00000009		
JX0255	10/26/2020	North Carolina Department of Transportation Zip Code Data - Residential Address History File	NCDOT_00000010	NCDOT_00000010		
JX0256	10/26/2020	North Carolina Department of Transportation - Residential Address History File	NCDOT_00000011	NCDOT_00000011		
JX0257	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number - Mailing Address History File	NCDOT_00000012	NCDOT_00000012		
JX0258	10/26/2020	North Carolina Department of Transportation Address 1 Data - Mailing Address History File	NCDOT_00000013	NCDOT_00000013		
JX0259	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number - Citizen File	NCDOT_00000014	NCDOT_00000014		
JX0260	10/26/2020	North Carolina Department of Transportation First Name Data - Citizen File	NCDOT_00000015	NCDOT_00000015		
JX0261	10/26/2020	North Carolina Department of Transportation Middle Name Data - Citizen File	NCDOT_00000016	NCDOT_00000016		
JX0262	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number - Citizen History File	NCDOT_00000017	NCDOT_00000017		
JX0263	10/26/2020	North Carolina Department of Transportation First Name Data - Citizen History File	NCDOT_00000018	NCDOT_00000018		
JX0264	10/26/2020	North Carolina Department of Transportation Middle Name Data - Citizen History File	NCDOT_00000019	NCDOT_00000019		
JX0265	10/26/2020	North Carolina Department of Transportation Last Name Data - Citizen History File	NCDOT_00000020	NCDOT_00000020		
JX0266	10/26/2020	North Carolina Department of Transportation Employee Data	NCDOT_00000021	NCDOT_00000021		
JX0267	10/26/2020	North Carolina Department of Transportation Employee Data	NCDOT_00000022	NCDOT_00000022		
JX0268	10/26/2020	DMV Systems Data Dictionary	NCDOT_00000023	NCDOT_00000023		
JX0269	12/20/2018	North Carolina Department of Transportation Broadcast Message re: Senate Bill 824 - Photographic Identification to Vote	NCDOT_00000024	NCDOT_00000024		
JX0270	4/30/2019	North Carolina Department of Transportation Memorandum re: Implementation of Senate Bill 824 and the Impact on the Driver License Offices	NCDOT_00000025	NCDOT_00000026		
JX0271	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number Data - Driver ID File	NCDOT_00000027	NCDOT_00000027		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0272	10/26/2020	North Carolina Department of Transportation Driver's License or Identification Number Data - Status File	NCDOT_00000028	NCDOT_00000028			
JX0273	11/16/2020	North Carolina Department of Public Safety Employee Data	NCDPS_00000001	NCDPS_00000001			
JX0274	11/2/2020	North Carolina Retirement Systems Description of Dataset	NCRS_00000001	NCRS_00000003			
JX0275	10/27/2020	North Carolina Retirement Systems Employee Data	NCRS_00000004	NCRS_00000004			
JX0276	10/27/2020	North Carolina Retirement Systems Employee Data	NCRS_00000005	NCRS_00000005			
JX0277	11/18/2020	Affidavit of Charles Clift in Response to Non-Party Subpoena Issued to North Carolina State University in Holmes et al. v. Moore et al.	NCSU_00000001	NCSU_00000004			
JX0278	11/18/2020	North Carolina State University Student Directory Data	NCSU_00000005	NCSU_00000005			
JX0279	11/9/2020	North Carolina Wesleyan College Student Directory Data	NCWC_00000001	NCWC_00000001			
JX0280	10/15/2020	Office of State Human Resources Employee Data	OSHR_00000001	OSHR_00000001			
JX0281	10/15/2020	Letter from J. Finarelli to J. Loperfido et al. re Holmes et al. v. Moore et al. Office of State Human Resources Subpoena Response	OSHR_00000002	OSHR_00000004			
JX0282	10/5/2020	Affidavit of Shelly Stone-Moye in Response to Non-Party Subpoena Issued to Piedmont Community College in Holmes et al. v. Moore et al.	PCC_00000001	PCC_00000003			
JX0283	10/5/2020	Piedmont Community College Student Directory Data	PCC_0000004	PCC_0000004			
JX0284	11/17/2020	Piedmont Community College Employee Directory Data	PCC_0000005	PCC_0000005			
JX0285	10/2/2020	Pfeiffer University 2019 Academic Year Directory Data	PFEIFFER_000001	PFEIFFER_000507			
JX0286	10/2/2020	Pfeiffer University Fall 2020 Student Directory Data	PFEIFFER_000508	PFEIFFER_000903			
JX0287	10/21/2020	Pfeiffer University 2019 Student Directory Data	PFEIFFER_000904	PFEIFFER_000904			
JX0288	10/21/2020	Pfeiffer University Fall 2020 Student Directory Data	PFEIFFER_000905	PFEIFFER_000905			
JX0289	9/28/2020	Queens University Student Demographic Data	QU_00000001	QU_0000001			
JX0290	9/28/2020	Queens University Student Directory Data	QU_00000002	QU_00000002			
JX0291	9/28/2020	Queens University Student Directory Data	QU_00000003	QU_00000003			
JX0292	10/23/2020	Rowan Cabarrus Student Directory Data	RCCC_00000004	RCCC_00000004			
JX0293	11/19/2020	Rowan Cabarrus Employee Directory Data	RCCC_00000006	RCCC_00000006			
JX0294	11/4/2020	Roanoke-Chowan Community College Student Directory Data	ROANOKE-CHOWAN- CC 00000001	ROANOKE-CHOWAN- CC 00000001			
	/ . /	Affidavit of Dr. Crystal P. Ange in Response to Non-Party Subpoena Issued to Roanoke-Chowan	ROANOKE-CHOWAN-	ROANOKE-CHOWAN-			
JX0295	11/4/2020	Community College in Holmes et al. v. Moore et al.	CC 00000002	CC 00000005			
JX0296	11/18/2020	St. Augustine's University Student Directory Data	SAU 00000001	SAU 00000001			
JX0297	11/18/2020	Letter from B. Jones to J. Loperfido et al. re Holmes et al. v. Moore et al. St. Augustine's University Subpoena Response	SAU_00000002	SAU_00000002			
JX0298	6/17/2020	Southeastern Baptist Theological Seminary - Ledford Center Policies and Procedures	SE_Baptist_Seminary_0000000 1	SE_Baptist_Seminary_0000000 5			
JX0299	6/17/2020	Southeastern Baptist Theological Seminary Student Demographic Data	SE_Baptist_Seminary_0000000 6	SE_Baptist_Seminary_0000000 6			
	12/6/2019	Email from E. Colon re: Student ID Card for Voting - Required Voter ID Information Sheet Attached	SE_Baptist_Seminary_0000000 7	SE_Baptist_Seminary_0000002			
JX0300		Attachment: VoterID_infosheet_collegestudents_20190826(2).pdf					
JX0301	6/17/2020	Letter from E. Boyle to J. Loperfido re: Holmes et al. v. Moore et al. Southeastern Baptist Theological Seminary Subpoena Response	3	SE_Baptist_Seminary_0000002 4			
JX0302	6/17/2020	Southeastern Baptist Theological Seminary Student Directory Information Form	SE_Baptist_Seminary_0000002 5	6			
JX0303	6/17/2020	Southestern Baptist Theological Seminary Student Directory Data	SE_Baptist_Seminary_0000002 7	7			
JX0304	9/22/2020	Shaw University's Response to Subpoena Duces Tecum in Holmes et al. v. Moore et al.	SU_0000001	SU_0000004			
JX0305	9/22/2020	Shaw University Student Directory Data	SU_0000005	SU_00000005			
JX0306	9/22/2020	Shaw University Welcome Letter	SU_00000006	SU_00000006			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0307	9/22/2020	Shaw University Common Data Set 2019-2020	SU_00000007	SU_0000010			
JX0308	4/24/2013	Email from A. Moretz to Rep. D. Lewis re Fall 2012 Enrollment Report	-	-			
JX0309	9/22/2020	Shaw University Fall Enrollment Data	SU_0000011	SU_0000013			
JX0310	11/20/2020	Affidavit of Lynne Horgan In Response to Non-Party Subpoena Issued to the University of North Carolina Asheville in <i>Holmes et al. v. Moore et al.</i>	UNCA_00000001	UNCA_00000004			
JX0311	11/20/2020	UNC Asheville Student Directory Data	UNCA_00000005	UNCA_00000005			
JX0312	9/23/2020	Affidavit of Jonathan Reece in Response to Non-Party Subpoena Issued to UNC Charlotte in Holmes et al. v. Moore et al.	UNCC_00000001	UNCC_00000003			
JX0313	9/23/2020	UNC Charlotte Student Directory Data	UNCC_00000004	UNCC_00000004			
JX0314	10/27/2020	Letter from N. Sullivan to J. Loperfido et al. re: Holmes et al. v. Moore et al. UNC Chapel Hill Subpoena Response	UNCCH_00000001	UNCCH_00000002			
JX0315	10/5/2020	Affidavit of [Affiant] in Response to Non-Party Subpoena Issued to the University of North Carolina at Chapel Hill in Holmes et al. v. Moore et al.	UNCCH_00000003	UNCCH_00000006			
JX0316	10/27/2020	UNC Chapel Hill Student Directory Data - Pre-Health	UNCCH_00000007	UNCCH_00000007			
JX0317	10/27/2020	UNC Chapel Hill Student Directory Data - All Majors	UNCCH_00000008	UNCCH_00000008			
JX0318	10/5/2020	Affidavit of Christopher M. Partridge in Response to Non-Party Subpoena Issued to UNC Greensboro in Holmes et al. v. Moore et al.	UNCG_00000001	UNCG_00000003			
JX0319	Aug-17	2012 & 2016 Campus Report on Student Voting Rates for UNC Greensboro	UNCG_0000004	UNCG_0000016			
JX0320	4/17/2013	Email from G. Bartlett to R. Starling et al. re Comments on PCS	-	-			
JX0321	10/5/2020	UNC Greensboro Student Directory Data	UNCG_0000017	UNCG_0000017			
JX0322	9/30/2020	Declaration of Christina Reeves in Response to Non-Party Subpoena Issued to the University of North Carolina Pembroke in Holmes et al. v. Moore et al.	UNCP_00000001	UNCP_00000003			
JX0323	9/30/2020	UNC Pembroke Student Directory Data	UNCP_0000004	UNCP_0000004			
JX0324	11/5/2020	Affidavit of Sharon D. Hush in Response to Non-Party Subpoena Issued to University of North Carolina School of the Arts in Holmes et al. v. Moore et al.	UNCSA_00000001	UNCSA_00000003			
JX0325	11/5/2020	UNC School of the Arts Student Directory Data	UNCSA_00000004	UNCSA_00000004			
JX0326	10/6/2020	Affidavit of Amanda Fleming in Response to Non-Party Subpoenas Issued to The University of North Carolina at Wilmington in Holmes et al. v. Moore et al.	UNCW_00000001	UNCW_00000003			
JX0327	9/28/2020	Affidavit of Sharon Boyd in Response to Non-Party Subpoenas Issued to The University of North Carolina at Wilmington in Holmes et al. v. Moore et al.	UNCW_0000004	UNCW_0000006			
JX0328	10/6/2020	UNC Wilmington Student Directory Data	UNCW_0000007	UNCW_0000007			
JX0329	11/2/2020	Affidavit of Patricia A. Pfeiffer In Response to Non-Party Subpoena Issued to Wayne Community College in Holmes et al. v. Moore et al.	WCC_0000001	WCC_00000003			
JX0330	11/2/2020	Wayne Community College Student Directory Data	WCC_0000004	WCC_0000004			
JX0331	11/2/2020	Wayne Community College ID Procedure Manual	WCC_00000005	WCC_00000010			
JX0332	10/19/2020	Affidavit of Walker in Response to Non-Party Subpoena Issued to Western Carolina University in Holmes et al. v. Moore et al.	WCU_00000001	WCU_00000004			
JX0333	10/19/2020	Western Carolina University Student Directory Data	WCU_00000005	WCU_0000005			
JX0334	10/1/2020	Wake Forest University Student Directory Data	WFU_00000001	WFU_00000001			
JX0335	10/1/2020	Wake Forest University Student Directory Data	WFU_00000002	WFU_00000002	<u> </u>		
JX0336	9/25/2020	William Peace University Student Handbook 2020-2021	WPU0000001	WPU0000077			
JX0337	9/25/2020	William Peace University Student Directory Data	WPU0000078	WPU0000078			
JX0338	9/25/2020	Letter from J. Townsend to J. Loperfido et al. re: Holmes et al. v. Moore et al. Subpoena Response to Meredith College, Elon University, and William Peace University	WPU0000079	WPU0000080			
JX0339	9/25/2020	Non-Party Confidential Supplemental Responses and Objections of William Peace University to Third Party Subpoena for Documents	WPU00000081	WPU0000099			
JX0340	11/16/2020	Affidavit of [Affiant] in Response to Non-Party Subpoena Issued to Winston-Salem State University in Holmes et al. v. Moore et al.	WSSU_00000001	WSSU_00000004			
JX0341	9/28/2020	Winston-Salem State University Student Directory Data	WSSU_00000005	WSSU_00000005			
JX0342	10/29/2020	Winston-Salem State University Student Directory Data	WSSU_00000006	WSSU_00000006	<u> </u>		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0343	10/12/2020	Letter from A. Hornthal to T. Williams et al. re: Holmes et al. v. Moore et al. Response to Subpoena to Warren Wilson College	WWC_0000001	WWC_00000002		
JX0344	10/12/2020	Warren Wilson College Demographic Data	WWC_0000003	WWC_0000003		
JX0345	10/12/2020	Warren Wilson College Student Directory Data	WWC 00000004	WWC 00000004		
JX0346	10/12/2020	Warren Wilson College Student Directory Data	WWC 00000005	WWC 00000005		
JX0347	10/12/2020	Warren Wilson College Student Directory Data	WWC 00000006	WWC 00000006		
JX0348	-	NCSBOE Voter Outreach Task List for VIVA Implementation (HB 589)	Holmes SBOE POD 003996	Holmes SBOE POD 003996		
JX0349	-	North Carolina Election Day Voting Equipment By County	Holmes SBOE POD 070876	Holmes SBOE POD 070877		
JX0350	6/13/1969	North Carolina Gen. Assembly 1969 Sess: Chapter 827 - H.B. 562				
JX0351	6/16/1969	North Carolina Gen. Assembly 1969 Sess: Chapter 872 - H.B. 465	-	-		
JX0352	6/20/1969	North Carolina Gen. Assembly 1969 Sess: Chapter 932 - H.B. 568	-	-		
JX0353	6/23/1969	North Carolina Gen. Assembly 1969 Sess: Chapter 1004 - H.B. 327	-	-		
JX0354	7/2/1969	North Carolina Gen. Assembly 1969 Sess: Chapter 1270 - S.B. 362	-	-		
JX0355	4/16/1971	North Carolina Gen. Assembly 1971 Sess: Chapter 201 - H.B. 002	-	-		
JX0356	5/27/1971	North Carolina Gen. Assembly 1971 Sess: Chapter 451 - S.B. 063	-	-		
JX0357	6/14/1971	North Carolina Gen. Assembly 1971 Sess: Chapter 560 - H.B. 086	_	_		
JX0358	6/21/1971	North Carolina Gen. Assembly 1971 Sess: Chapter 630 - S.B. 096	HOLMES 00006153	HOLMES 00006155		
JX0359	7/14/1971	North Carolina Gen. Assembly 1971 Sess: Chapter 857 - H.B. 1181	-	-		
JX0360	5/9/1973	North Carolina Gen. Assembly 1971 Sess: Chapter 394 - H.B. 554	_	_		
JX0361	4/8/1974	North Carolina Gen. Assembly 1973 Sess: Chapter 1994 - 11.8. 394 North Carolina Gen. Assembly 1973 Sess: Chapter 1222- S.B. 1420	-	-		
JX0362	6/17/1975	North Carolina Gen. Assembly 1975 Sess: Chapter 641 - S.B. 407	-	-		
JX0363	6/25/1975	North Carolina Gen. Assembly 1975 Sess: Chapter 826 - H.B. 1033	_	_		
JX0364	3/14/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 80 - H.B. 1990	-	-		
JX0365	3/28/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 30 - H.B. 090	-	-		
JX0366	1/25/2013	Email from B. Jones to El Churchill et al. re Voter ID Bill	-	-		
JX0367	5/11/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 363 - S.B. 293	-	-		
JX0367 JX0368	6/7/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 489 - S.B. 594	-	-		
JX0369	6/20/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 469 - 3.B. 354	-	-		
JX0309 JX0370	6/23/1977	North Carolina Gen. Assembly 1977 Sess: Chapter 636 - 3.B. 663	-	-		
JX0370 JX0371	5/26/1981	North Carolina Gen. Assembly 1981 Sess: Chapter 455 - H.B. 778	HOLMES 00006301	HOLMES 00006302		
JX0371 JX0372	6/5/1981	, ,	HOLIMES_00006301	HOLIVIES_00006302		
		North Carolina Gen. Assembly 1981 Sess: Chapter 504 - S.B. 300	-	-		
JX0373 JX0374	6/5/1981	North Carolina Gen. Assembly 1981 Sess: Chapter 513 - H.B. 783	HOLMES_00006156	HOLMES_00006156		
	7/3/1981	North Carolina Gen. Assembly 1981 Sess: Chapter 803 - H.B. 782	-	-		
JX0375 JX0376	7/3/1981	North Carolina Gen. Assembly 1981 Sess: Chapter 808 - H.B. 1121	-	-		
	7/8/1981	North Carolina Gen. Assembly 1981 Sess: Chapter 887 - S.B. 568	-	-		
JX0377 JX0378	6/18/1982	North Carolina Gen. Assembly 1981 Sess: Chapter 1241 - S.B. 572				
JX0378 JX0379	6/18/1982	North Carolina Gen. Assembly 1981 Sess: Chapter 1247 - H.B. 1325	-	-		
JX0379 JX0380	5/11/1983	North Carolina Gen. Assembly 1983 Sess: Chapter 298 - H.B. 458	-	-		
	7/15/1983	North Carolina Gen. Assembly 1983 Sess: Chapter 765 - H.B. 909	-	-		
JX0381	4/5/1985	North Carolina Gen. Assembly 1985 Sess: Chapter 61 - H.B. 088	-	-		
JX0382	7/15/1985	North Carolina Gen. Assembly 1985 Sess: Chapter 768 - S.B. 711	HOLMES_00006302	HOLMES_00006307		
JX0383	6/27/1986	North Carolina Gen. Assembly 1985 Sess: Chapter 814 - H.B. 961	-	-		
JX0384	7/7/1986	North Carolina Gen. Assembly 1985 Sess: Chapter 920 - S.B. 685	-	-		
JX0385	7/8/1986	North Carolina Gen. Assembly 1985 Sess: Chapter 933 - H.B. 306	-	-		
JX0386	7/23/1993	North Carolina Gen. Assembly 1993 Sess: Chapter 497 - S.B. 1157	HOLMES_00006308	HOLMES_00006333		
JX0387	2/23/1995	North Carolina Gen. Assembly 1995 Sess: Chapter 003 - H.B. 131	HOLMES_00006338	HOLMES_00006339		
JX0388	6/15/1995	North Carolina Gen. Assembly 1995 Sess: Chapter 268 - S.B. 818	-	-		
JX0389	7/13/1995	North Carolina Gen. Assembly 1995 Sess: Chapter 429 - S.B. 004	-	-		
JX0390	4/11/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re Additional Analysis	-	-		
JX0391	3/18/1999	North Carolina Gen. Assembly 1999 Sess: Session Law 1999-3 - S.B. 023	-	-		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0392	4/10/2013	Email from R. Starling (Speaker Tillis' Office) to V. Degraffenreid et al. re Absentee Ballots	-	-			
JX0393	8/7/2003	North Carolina Gen. Assembly 2003 Sess: Session Law 2003-403 - S.B. 725	-	-			
JX0394	4/5/2013	Email from M. Burris to R. Starling (Speaker Tillis' Office) et al. re DMV Audit Items	-	-			
JX0395	3/28/2013	Email from T. Farr to S. Nichols et al. re DMV Audit Items	-	-			
JX0396	3/20/2013	Email from J. McLean to S. Nichols et al. re Interview of Gary Bartlett	-	-			
JX0397	7/18/2003	North Carolina Gen. Assembly 2003 Sess: Session Law 2003-423 - S.B. 965	HOLMES_00006334	HOLMES_00006335			
JX0398	7/17/2004	North Carolina Gen. Assembly 2003 Sess: Session Law 2004-128 - S.B. 577	-	-			
JX0399	4/8/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re DMV Audit Items	-	-			
JX0400	7/1/2010	North Carolina Gen. Assembly 2009 Sess: Session Law 2010-49 - H.B. 1307	-	-			
JX0401	9/14/2011	North Carolina Gen. Assembly 2011 Sess: Session Law 2011-409 - S.B. 514	-	-			
JX0402	7/18/2013	North Carolina Gen. Assembly 2013 Sess: Session Law 2013-300 - S.B. 399	-	-			
JX0403	4/4/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re DMV Audit Items	-	-			
JX0404	6/25/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-96 - S.B. 677	HOLMES 00006413	HOLMES 00006413			
JX0405	6/27/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-110 - H.B. 551	-	-			
JX0406	6/28/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-117 - H.B. 913	=	-			
JX0407	6/28/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-118 - S.B. 814	-	_			
JX0408	6/28/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-119 - S.B. 075	HOLMES 00006363	HOLMES 00006363			
JX0409	3/27/2013	Email from G. Bartlett to R. Starling (Speaker Tillis' Office) et al. re DMV Audit Items	-	-			
JX0410	6/29/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-128 - H.B. 1092	HOLMES 00006360	HOLMES 00006361			
JX0411	8/27/2018	North Carolina Gen. Assembly Second Extra 2018 Sess: Session Law 2018-132 - H.B. 003	HOLMES 00006350	HOLMES 00006353			
JX0412	8/27/2018	North Carolina Gen. Assembly Second Extra 2018 Sess: Session Law 2018-133 - H.B. 004	HOLMES 00006336	HOLMES 00006337			
JX0413	12/6/2018	North Carolina Gen. Assembly 2017 Sess: Session Law 2018-144 - S.B. 824	-	-			
JX0414	-	Information regarding H.B. 351 - N.C. Gen Assembly 2011 Sess.	-	-			
JX0415	_	Information regarding H.B. 589 - N.C. Gen Assembly 2013 Sess.		-			
JX0416	1/15/2021	Information regarding H.B. 1092 - N.C. Gen Assembly 2017 Sess.		_			
JX0417	1/15/2021	Audio from the Joint Legislative Elections Oversight Committee		_			
JX0418	11/26/2018	Joint Legislative Elections Oversight Committee Audio from 11.26.2018		_			
JX0419	10/1/2015	N.C. Gen. Statute 120-11.1: Article 3A: "Sessions; Electronic Voting"		_			
JX0420	-	N.C. Gen. Statute 120-70.141: Article 12P: "Purpose and Powers of Committee"	HOLMES 00006481	HOLMES 00006481			
37.0-120		Journal of the House of Representatives of the 2017 General Assembly of the State of North	110214123_00000481	110214123_00000481			
JX0421	2018	Carolina	-	-			
JX0422	2018	Journal of the Senate of the 2017 General Assembly of the State of North Carolina - Second Session 2018	-	-			
JX0423	2018	Journal of the Senate of the 2017 General Assembly of the State of North Carolina - Second Extra Session 2018	-	-			
JX0424	2002	Journal of the House of Representatives of the 2001 General Assembly of the State of North Carolina - Second Session 2002	-	-			
JX0425	2004	Journal of the House of Representatives of the 2003 General Assembly of the State of North Carolina - Third Extra Session 2004	-	-			
JX0426	2002	Journal of the Senate of the 2001 General Assembly of the State of North Carolina - Extra Session 2002	-				
JX0427	1/5/2012	General Assembly of North Carolina Session 2011 - Resolution 2012-1, Senate Joint Resolution 794	HOLMES_00006451	HOLMES_00006451			
JX0428	2/13/2018	General Assembly of North Carolina Session 2017 - Resolution 2018-4, Senate Joint Resolution 710	HOLMES_00006439	HOLMES_00006439			
JX0429	6/18/2011	General Assembly of North Carolina Session 2011 - Resolution 2011-9, Senate Joint Resolution 784	HOLMES_00006443	HOLMES_00006444			
JX0430	7/28/2011	General Assembly of North Carolina Session 2011 - Resolution 2011-10, House Joint Resolution 938	HOLMES_00006433	HOLMES_00006434			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0431	6/25/2018	General Assembly of North Carolina Session 2017 - Resolution 2018-10, House Joint Resolution 1101	HOLMES_00006437	HOLMES_00006437		
JX0432	7/2/2015	General Assembly of North Carolina Session 2015 - Resolution 2015-11, Senate Joint Resolution 717	HOLMES_00006456	HOLMES_00006456		
JX0433	11/7/2011	General Assembly of North Carolina Session 2011 - Resolution 2011-12, Senate Joint Resolution 793	HOLMES_00006447	HOLMES_00006450		
JX0434	8/3/2017	General Assembly of North Carolina Session 2017 - Resolution 2017-14, House Joint Resolution 926	HOLMES_00006435	HOLMES_00006436		
JX0435	8/31/2017	General Assembly of North Carolina Session 2017 - Resolution 2017-15, Senate Joint Resolution 692	HOLMES_00006445	HOLMES_00006446		
JX0436	10/9/2017	General Assembly of North Carolina Session 2017 - Resolution 2017-17, Senate Joint Resolution 696	HOLMES_00006440	HOLMES_00006441		
JX0437	8/28/1997	General Assembly of North Carolina 1997 Session - Resolution 33, House Joint Resolution 306	HOLMES_00006431	HOLMES_00006432		
JX0438	4/9/1973	General Assembly of North Carolina 1973 - Resolution 58 S.R. 412	-	-		
JX0439	7/10/1981	General Assembly of North Carolina 1981 Session - Resolution 1981-66, Senate Joint Resolution 733	-	-		
JX0440	10/10/1981	General Assembly of North Carolina 1981 Session - Resolution 1981-80, House Joint Resolution 1427	HOLMES_00006885	HOLMES_00006885		
JX0441	11/20/2020	DHHS Death File Data "DHHS Death File_v2.xlsx" (12.5MB)	-	-		
JX0442	11/11/2020	DHHS NC Mortality Data from 2010-2013 "2010-2013 NC MortalityV2.csv" (27.1MB)	-	-		
JX0443	11/11/2020	DHHS NC Mortality Data from 2014-2019 "2014-YTD2019 NC MortalityV2.csv" (63.2MB)	-	-		
JX0444	11/12/2020	Voter Files Data - Voter Registration "dbo_VOTER_REG.csv" (8.17GB)	-	-		
JX0445	11/12/2020	Voter Files Data - Election "dbo_LK_VH_ELECTION.csv" (3.7MB)	-	-		
JX0446	11/12/2020	Voter Files Data - Voter History "dbo_VOTER_HISTORY.csv" (11.31GB)	-	-		
JX0447	12/14/2020	Voter Files Data - Voter ID "voter_id_cbe_printed.xlsx" (164KB), manually cleaned to "NCSBE_ready.xlsx"	-	-		
JX0448	2/18/2010	National Change of Address Files (2/18/2010) "ncoa_match_20100218.csv (10.4MB)	-	-		
JX0449	7/27/2010	National Change of Address Files (7/27/2010) "ncoa_match_20100727.csv" (15.3MB)	-	-		
JX0450	2/28/2011	National Change of Address Files (2/28/2011) "ncoa_match_20110228.csv" (15.6MB)	-	-		
JX0451	6/30/2011	National Change of Address Files (6/30/2011) "ncoa_match_20110630.csv" (10.2MB)	-	-		
JX0452	1/3/2012	National Change of Address Files (1/3/2012) "ncoa_match_20120103.csv" (14.9MB)	-	-		
JX0453	7/27/2012	National Change of Address Files (7/27/2012) "ncoa_match_20120727.csv" (12.6MB)	-	-		
JX0454	1/8/2013	National Change of Address Files (1/8/2013) "ncoa_match_20130108.csv" (13.1MB)	-	-		
JX0455	6/25/2013	National Change of Address Files (6/25/2013) "ncoa_match_20130625.csv" (19.6MB)	-	-		
JX0456	1/13/2014	National Change of Address Files (1/13/2014) "ncoa_match_20140113.csv" (21.9MB)	-	-		
JX0457	7/25/2014	National Change of Address Files (7/25/2014) "ncoa_match_20140725.csv" (18.1MB)	-	-		
JX0458	2/24/2015	National Change of Address Files (2/24/2015) "ncoa_match_20150224.csv" (16.7MB)	-	-		
JX0459	6/25/2015	National Change of Address Files (6/25/2015) "ncoa_match_20150625.csv" (11.1MB)	-	-		
JX0460	7/1/2015	National Change of Address Files (7/01/2015) "ncoa_match_20150701.csv" (11MB)	-	-		
JX0461	11/30/2015	National Change of Address Files (11/30/2015) "ncoa_match_20151130.csv" (15.3MB)	-	-		
JX0462	6/17/2016	National Change of Address Files (6/17/2016) "ncoa_match_20160617.csv" (15.1MB)	-	-		
JX0463	7/11/2017	National Change of Address Files (7/11/2017) "ncoa_match_20170711.csv" (17.1MB)	-	-		
JX0464	1/4/2018	National Change of Address Files (1/4/2018) "ncoa_match_20180104.csv" (20MB)	-	-		
JX0465	6/26/2018	National Change of Address Files (6/26/2018) "ncoa_match_20180626.csv" (15.8MB)	-	-		
JX0466	1/10/2019	National Change of Address Files (1/10/2019) "ncoa_match_20190110.csv" (17.8MB)	=	-		
JX0467	7/1/2019	National Change of Address Files (7/1/2019) "ncoa_match_20190701.csv" (16.9MB)	=	-		
JX0468	1/3/2020	National Change of Address Files (1/3/2020) "ncoa_match_20200103.csv" (18.9MB)	-	-		
JX0469	7/7/2020	National Change of Address Files (7/7/2020) "ncoa_match_20200707.csv" (18MB)	-	-		
JX0470	-	SBOE No-Match List of Voter Registration "VOTER_REG.txt" (5.44GB)	-	-		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0471	5/15/2019	November 6, 2018 Official General Election Results - Statewide (Exhibit A to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0472	5/15/2019	Selected Characteristics of People at Specified Levels of Poverty in the Past 12 Months 2017 American Community Survey 5-year Estimates (Exhibit G to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0473	5/15/2019	Hours and Locations of Different County Board of Elections, County BOE Information (Exhibit H to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0474	3/15/2019	NC SBOE Letter from K. Strach Approving Student and Employee ID Cards for Colleges and Universities (Exhibit I to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0475	5/15/2019	North Carolina Poverty Statistics provided by the University of North Carolina School of Law (Exhibit J to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0476	5/15/2019	Senate Bill 824 History (Exhibit L to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0477	5/15/2019	House Bill 646 History (Exhibit M to Plaintiffs' Motion for a Preliminary Injunction)	-	-		
JX0478	6/29/2018	Session Law 2018-128, House Bill 1092	-	-		
JX0479	6/25/2018	Amendment No. A1 to HB 1092 by Rep. Lewis	-	-		
JX0480	6/28/2018	Amendment No. A1 to HB 1092 by Sen. McKissick	-	-		
JX0481	6/25/2018	Amendment No. A2 to HB 1092 by Rep. Floyd	-	-		
JX0482	6/28/2018	Amendment No. A2 to HB 1092 by Sen. Clark	-	-		
JX0483	6/25/2018	Amendment No. A3 to HB 1092 by Rep. Ager	-	-		
JX0484	6/25/2018	Amendment No. A3 to HB 1092 by Rep. Smith	-	-		
JX0485	6/28/2018	Amendment No. A4 to HB 1092	-	-		
JX0486	6/25/2018	Amendment No. A5 to HB 1092 by Rep. Ager	-	-		
JX0487	6/25/2018	Amendment to HB 1092 Ruled Out of Order by Rep. John	-	-		
JX0488	6/21/2018	House Bill 1092, Proposed Committee Substitute	-	-		
JX0489	6/7/2018	House Bill 1092 as Filed	-	-		
JX0490	6/7/2018	House Bill 1092, Version 1	-	-		
JX0491	6/7/2018	House Bill 1092, Version 2	-	-		
JX0492	6/7/2018	House Bill 1092, Version 3	-	-		
JX0493	4/17/2013	North Carolina State Board of Elections, 2013 SBOE-DMV ID Analysis	-	-		
JX0494	6/29/2018	House Bill 1092, Ratified Bill	-	-		
JX0495	6/25/2018	House Roll Call Vote Transcript for Roll Call #1256 re: A1 Lewis Second Reading (HB 1092)	-	-		
JX0496	6/25/2018	House Roll Call Vote Transcript for Roll Call #1257 re: A5 Ager Second Reading (HB 1092)	-	_		
JX0497	6/25/2018	House Roll Call Vote Transcript for Roll Call #1258 re: Second Reading (HB 1092)	-	_		
JX0498	6/26/2018	House Roll Call Vote Transcript for Roll Call #1260 re: Third Reading (HB 1092)	-	_		
JX0499	6/28/2018	Senate Roll Call Vote Transcript for Roll Call #776 re: Amendment 1 (HB 1092)	-	_		
JX0500	6/28/2018	Senate Roll Call Vote Transcript for Roll Call #777 re: Amendment 2 (HB 1092)	-	_		
JX0501	3/12/2013	3/12/13 House Elections Committee Transcript of Proceedings				
JX0502	3/13/2013	3/13/13 House Elections Committee Transcript of Proceedings				
JX0502	4/10/2013	4/10/13 House Elections Committee Transcript of Public Hearing on Voter Identification				
JX0504	4/10/2013	4/10/13 House Elections Committee Transcript of Proceedings				
JX0505	4/17/2013	4/17/13 House Elections Committee Transcript of Proceedings				
JX0506	4/23/2013	4/23/13 House Appropriations Committee Transcript of Proceedings				
JX0507	4/24/2013	4/24/13 House Floor Session Transcript of the Proceedings				
JX0508	7/24/2013	7/24/13 Senate Floor Session Transcript of Proceedings				
JX0509	7/25/2013	7/25/13 Senate Floor Session Transcript of Proceedings				
JX0510	6/28/2018	Senate Roll Call Vote Transcript for Roll Call #779 re: Second Reading (HB 1092)	-	-		
JX0510	6/29/2018	Senate Roll Call Vote Transcript for Roll Call #792 re: Third Reading (HB 1092)	-	_		
JX0512	5/22/2020	House Bill 1169 as Filed	-	_		
JX0512	5/22/2020	House Bill 1169, Version 1	-	_		
JX0513	5/22/2020	House Bill 1169, Version 2		-		
370314	3/22/2020		=			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0515	5/22/2020	House Bill 1169, Version 3	-	-		
JX0516	5/22/2020	House Bill 1169, Version 4	-	-		
JX0517	5/22/2020	House Bill 1169, Version 5	-	-		
JX0518	5/22/2020	House Bill 1169, Version 6	-	-		
JX0519	6/11/2020	House Bill 1169, Ratified Bill	-	-		
JX0520	5/27/2020	House Bill 1169, Proposed Committee Substitute	-	-		
JX0521	5/27/2020	House Bill 1169, Proposed Committee Substitute, Version 2	-	-		
JX0522	5/28/2020	Amendment No. A1 to HB 1169 by Rep. Lewis	-	-		
JX0523	6/2/2020	House Bill 1169, Proposed Senate Committee Substitute	-	-		
JX0524	6/2/2020	House Bill 1169, Proposed Senate Committee Substitute, Version 2	-	-		
JX0525	6/10/2020	Amendment No. A1 to HB 1169 by Sen. Clark	-	-		
JX0526	6/10/2020	Amendment No. A2 to HB 1169	-	-		
JX0527	6/10/2020	Amendment No. A3 to HB 1169 by Sen. Marcus	-	-		
JX0528	6/10/2020	Amendment No. A4 to HB 1169 by Sen. Marcus	-	-		
JX0529	6/10/2020	Amendment No. A5 to HB 1169 by Sen. Smith	-	-		
JX0530	6/11/2020	Amendment No. A6 to HB 1169 by Sen. Smith	-	-		
JX0531	5/28/2020	House Roll Call Vote Transcript for Roll Call #935 re: Second Reading (HB 1169)	-	-		
JX0532	6/10/2020	Senate Roll Call Vote Transcript for Roll Call #720 re: Amendment 1 (HB 1169)	-	-		
JX0533	6/10/2020	Senate Roll Call Vote Transcript for Roll Call #721 re: Amendment 2 (HB 1169)	-	-		
JX0534	6/10/2020	Senate Roll Call Vote Transcript for Roll Call #722 re: Amendment 3 (HB 1169)	_	-		
JX0535	6/10/2020	Senate Roll Call Vote Transcript for Roll Call #723 re: Amendment 4 (HB 1169)	-	-		
JX0536	6/10/2020	Senate Roll Call Vote Transcript for Roll Call #724 re: Second Reading (HB 1169)	-	-		
JX0537	6/11/2020	Senate Roll Call Vote Transcript for Roll Call #726 re: Amendment 6 (HB 1169)	_	-		
JX0538	6/11/2020	Senate Roll Call Vote Transcript for Roll Call #727 re: Third Reading (HB 1169)	_	-		
JX0539	6/11/2020	House Roll Call Vote Transcript for Roll Call #959 re: M11 Concur (HB 1169)	_	-		
JX0540	4/4/2013	House Bill 589 as Filed	-	-		
JX0541	4/8/2013	House Bill 589, Version 1	_	-		
JX0542	4/8/2013	House Bill 589, Version 2	_	_		
JX0543	4/8/2013	House Bill 589, Version 3	_	-		
JX0544	4/8/2013	House Bill 589, Version 4	_	-		
JX0545	4/8/2013	House Bill 589, Version 5	_	_		
JX0546	4/8/2013	House Bill 589, Version 6	-	_		
JX0547	4/8/2013	House Bill 589, Version 7	<u> </u>	_		
JX0548	7/26/2013	House Bill 589, Ratified Bill	-	_		
JX0549	4/17/2013	House Bill 589, Proposed House Committee Substitute, Version 1	_	_		
JX0550	4/18/2013	House Bill 589, Proposed House Committee Substitute, Version 2	-	_		
JX0551	4/23/2013	House Bill 589, Proposed House Committee Substitute, Version 3	-	_		
JX0551	7/23/2013	House Bill 589, Proposed Floure Committee Substitute, Version 5	-	-		
JX0553	4/24/2013	Amendment No. A1 to HB 589 by Rep. Tine	_	_		
JX0554	4/24/2013	Amendment No. A2 to HB 589 by Rep. Jackson	-			
JX0555	4/24/2013	Amendment No. A2 to HB 589 by Rep. C. Graham	-	-		
JX0556	4/24/2013	Amendment No. A4 to HB 589 by Rep. Adams	-	-	1	
JX0557	4/24/2013	Amendment No. A5 to HB 589 by Rep. C. Graham	-	-	+	
JX0557	4/24/2013	Amendment No. A5 to HB 589 by Rep. E. Grandm	-	-	+	
JX0558	4/24/2013	Amendment No. A7 to HB 589 by Rep. Fisher	-	-		
JX0560	4/24/2013	Amendment No. A7 to HB 589 by Rep. Glazier Amendment No. A8 to HB 589 by Rep. Glazier	-	-	1	
JX0560 JX0561	4/24/2013	Amendment No. A8 to HB 589 by Rep. Glazier Amendment No. A9 to HB 589 by Rep. D. Hall	-	-	+	
JX0561 JX0562	4/24/2013	Amendment No. A9 to HB 589 by Rep. D. Hall Amendment No. A10 to HB 589 by Rep. D. Ross	-	-		
JX0562 JX0563		, ,				
JX0563 JX0564	4/18/2013	House Bill 589 Legislative Fiscal Note, Second Edition	-	-		
JXU504	7/25/2013	House Bill 589 Legislative Fiscal Note, Seventh Edition	-	-		

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes		
JX0565	7/25/2013	House Bill 589 Legislative Incarceration Fiscal Note, Seventh Edition	-	-			
JX0566	4/18/2013	House Bill 589 Legislative Incarceration Fiscal Note, Second Edition	-	-			
JX0567	7/24/2013	Amendment No. A1 to HB 589 by Sen. Stein	-	-			
JX0568	7/24/2013	Amendment No. A2 to HB 589 by Sen. McKissick	-	-			
JX0569	7/24/2013	Amendment No. A3 to HB 589 by Sen. Rucho	-	-			
JX0570	7/24/2013	Amendment No. A4 to HB 589 by Sen. Stein	-	-			
JX0571	7/24/2013	Amendment No. A5 to HB 589 by Sen. Apodaca	-	-			
JX0572	7/24/2013	Amendment No. A6 to HB 589 by Sen. Rucho	-	-			
JX0573	7/24/2013	Amendment No. A7 to HB 589 by Sen. Kinnaird	-	-			
JX0574	7/24/2013	Amendment No. A8 to HB 589 by Sen. Graham	-	-			
JX0575	7/24/2013	Amendment No. A9 to HB 589 by Sen. Robinson	-	-			
JX0576	7/24/2013	Amendment No. A10 to HB 589 by Sen. Bryant	-	-			
JX0577	7/25/2013	Amendment No. A11 to HB 589 by Sen. Rucho	-	-			
JX0578	7/25/2013	Amendment No. A12 to HB 589 by Sen. Blue	-	-			
JX0579	7/25/2013	Amendment No. A13 to HB 589 by Sen. Blue	_	-			
JX0580	7/25/2013	Amendment No. A14 to HB 589 by Sen. Blue	-	-			
JX0581	4/24/2013	House Roll Call Vote Transcript for Roll Call #340 re: Amendment A1 Tine Second Reading (HB 589)	-	-			
JX0582	4/24/2013	House Roll Call Vote Transcript for Roll Call #341 re: Amendment A2 Jackson Second Reading (HB 589)	-	-			
JX0583	4/24/2013	House Roll Call Vote Transcript for Roll Call #342 re: Amendment A4 Adams Second Reading(HB 589)	-	-			
JX0584	4/24/2013	House Roll Call Vote Transcript for Roll Call #343 re: Amendment A5 Graham, C. Second Reading (HB 589)	-	-			
JX0585	4/24/2013	House Roll Call Vote Transcript for Roll Call #344 re: Amendment A6 Fisher Second Reading (HB 589)	-	-			
JX0586	4/24/2013	House Roll Call Vote Transcript for Roll Call #345 re: Amendment A7 Glazier Second Reading (HB 589)	-	-			
JX0587	4/24/2013	House Roll Call Vote Transcript for Roll Call #346 re: Amendment A8 Glazier Second Reading (HB 589)	-	-			
JX0588	4/24/2013	House Roll Call Vote Transcript for Roll Call #347 re: Amendment A9 Hall, D. Second Reading (HB 589)	-	-			
JX0589	4/24/2013	House Roll Call Vote Transcript for Roll Call #348 re: Amendment A10 Ross, D. Second Reading (HB 589)	-	-			
JX0590	4/24/2013	House Roll Call Vote Transcript for Roll Call #349 re: Second Reading (HB 589)	-	-			
JX0591	4/24/2013	House Roll Call Vote Transcript for Roll Call #350 re: Third Reading (HB 589)	-	-			
JX0592	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #858 re: Amendment 4 (HB 589)	-	-			
JX0593	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #859 re: Amendment 5 (HB 589)	-	-			
JX0594	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #860 re: Amendment 2 (HB 589)	-	-			
JX0595	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #861 re: Amendment 6 (HB 589)	-	-			
JX0596	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #862 re: Amendment 7 (HB 589)	-	-			
JX0597	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #863 re: Amendment 8 (HB 589)	-	-			
JX0598	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #864 re: Amendment 9 (HB 589)	-	-			
JX0599	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #865 re: Amendment 10 (HB 589)	-	-			
JX0600	7/24/2013	Senate Roll Call Vote Transcript for Roll Call #866 re: Second Reading (HB 589)	-	-			
JX0601	7/25/2013	Senate Roll Call Vote Transcript for Roll Call #879 re: Amendment 11 (HB 589)	-	-			
JX0602	7/25/2013	Senate Roll Call Vote Transcript for Roll Call #880 re: Amendment 13 (HB 589)	-	-			
JX0603	7/25/2013	Senate Roll Call Vote Transcript for Roll Call #881 re: Amendment 14 (HB 589)	-	-			
JX0604	7/25/2013	Senate Roll Call Vote Transcript for Roll Call #882 re: Third Reading (HB 589)	-	-			

		Holmes et al. v. Moore et al., Case No. 18 (CVS 15292		
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes
JX0605	7/25/2013	House Roll Call Vote Transcript for Roll Call #1335 re: Motion 12- Committee of the Whole (HB 589)	-	-	
JX0606	7/25/2013	House Roll Call Vote Transcript for Roll Call #1336 re: M11 Concur Sen. Amendment 11 and 13 (HB 589)	-	-	
JX0607	7/25/2013	House Roll Call Vote Transcript for Roll Call #1337 re: M11 Concur (HB 589)	<u>-</u>	-	
JX0608	6/3/2019	Session Law 2019-22, House Bill 646	-	-	
JX0609	4/11/2019	Amendment No. A1 to HB 646 by Rep. Lewis	<u>-</u>	-	
JX0610	4/10/2019	House Bill 646, Proposed Committee Substitute	-	-	
JX0611	5/21/2019	House Bill 646, Proposed Senate Committee Substitute	-	-	
JX0612	4/9/2019	House Bill 646 as Filed	-	-	
JX0613	4/10/2019	House Bill 646, Version 1	-	-	
JX0614	4/11/2019	House Bill 646, Version 2	-	-	
JX0615	4/12/2019	House Bill 646, Version 3	-	-	
JX0616	4/13/2019	House Bill 646, Version 4	-	-	
JX0617	5/28/2019	House Roll Call Vote Transcript for Roll Call #463 on HB 646	-	-	
JX0618	5/28/2019	House Bill 646, Ratified Bill	-	-	
JX0619	4/11/2019	House Roll Call Vote Transcript for Roll Call #155 re: Amendment A1 Lewis Second Reading (HB 646)	-	-	
JX0620	4/11/2019	House Roll Call Vote Transcript for Roll Call #156 re: Second Reading of HB 646	-	-	
JX0621	5/23/2019	Senate Roll Call Vote Transcript for Roll Call #245 re: Second Reading of HB 646	-	-	
JX0622	12/5/2018	Amendment No. A13 to SB 824 by Rep. Richardson	HOLMES 00007862	HOLMES 00007862	
JX0623	12/5/2018	Amendment No. A12 to SB 824 by Rep. Pittman	HOLMES 00007863	HOLMES 00007863	
JX0624	12/5/2018	Amendment No. A11 to SB 824 by Rep. C. Graham	HOLMES 00007864	HOLMES 00007864	
JX0625	12/5/2018	Amendment No. A10 to SB 824 by Rep. Lewis	HOLMES 00007865	HOLMES 00007866	
JX0626	12/5/2018	Amendment No. A9 to SB 824 by Rep. Pittman	HOLMES 00007867	HOLMES 00007867	
JX0627	12/5/2018	Amendment No. A8 to SB 824 by Rep. Lewis	HOLMES 00007868	HOLMES 00007869	
JX0628	12/5/2018	Amendment No. A7 to SB 824 by Rep. Lewis	HOLMES 00007870	HOLMES 00007870	
JX0629	12/5/2018	Amendment No. A6 to SB 824 by Rep. Warren	HOLMES 00007871	HOLMES 00007872	
JX0630	12/5/2018	Amendment No. A5 to SB 824 by Rep. Warren	HOLMES 00007873	HOLMES 00007874	
JX0631	12/5/2018	Amendment No. A4 to SB 824 by Rep. Floyd	HOLMES 00007875	HOLMES 00007878	
JX0632	12/5/2018	Amendment No. A3 to SB 824 by Rep. Fisher	HOLMES 00007879	HOLMES 00007880	
JX0633	12/5/2018	Amendment No. A2 to SB 824 by Rep. Beasley	HOLMES 00007881	HOLMES 00007881	
JX0634	12/5/2018	Amendment No. A1 to SB 824 by Rep. Harrison	HOLMES 00007882	HOLMES 00007882	
JX0635	11/28/2018	Amendment No. A11 to SB 824 by Sen. Clark	HOLMES 00007883	HOLMES 00007883	
JX0636	11/28/2018	Amendment No. A10 to SB 824 by Sen. McKissick	HOLMES 00007884	HOLMES 00007884	
JX0637	11/28/2018	Amendment No. A9 to SB 824 by Sen. Woodward	HOLMES 00007885	HOLMES 00007886	
JX0638	11/28/2018	Amendment No. A8 to SB 824 by Sen. Lowe	HOLMES 00007887	HOLMES 00007888	
JX0639	11/28/2018	Amendment No. A7 to SB 824 by Sen. Van Duyn	HOLMES 00007889	HOLMES 00007889	
JX0640	11/28/2018	Amendment No. A6 to SB 824 by Sen. Clark	HOLMES 00007890	HOLMES 00007890	
JX0641	11/28/2018	Amendment No. A5 to SB 824 by Sen. Clark	HOLMES 00007891	HOLMES 00007891	
JX0642	11/28/2018	Amendment No. A4 to SB 824 by Sen. Krawiac	HOLMES 00007892	HOLMES 00007892	
JX0643	11/28/2018	Amendment No. A4 to 5B 824 by Sen. Nawiac Amendment No. A3 to SB 824 by Sen. Daniel	HOLMES 00007893	HOLMES 00007893	
JX0644	11/28/2018	Amendment No. A2 to SB 824 by Sen. Daniel	HOLMES 00007894	HOLMES 00007894	
JX0645	11/28/2018	Amendment No. A1 to SB 824 by Sen. Ford	HOLMES 00007895	HOLMES 00007895	
JX0646	12/19/2018	House Roll Call Vote Transcript for Roll Call #1354 re: Veto Override of SB 824	HOLMES 00007896	HOLMES 00007899	
JX0647	12/18/2018	Senate Roll Call Vote Transcript for Roll Call #824 re: Motion 11 Veto Override of SB 824	HOLMES 00007900	HOLMES 00007902	
JX0648	12/5/2018	House Roll Call Vote Transcript for Roll Call #1324 re: Third Reading of SB 824	HOLMES 00007903	HOLMES 00007906	
JX0648 JX0649	12/5/2018	House Roll Call Vote Transcript for Roll Call #1323 re: Second Reading of SB 824	HOLMES 00007907	HOLMES 00007900	
370043	12/3/2010	House Roll Call Vote Transcript for Roll Call #1321 re: Amendment A13 Richardson, B. Second	110FINIE2_00001301	110FINIE2_00007910	
JX0650	12/5/2018	Reading (SB 824)	HOLMES_00007911	HOLMES_00007914	

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0651	12/5/2018	House Roll Call Vote Transcript for Roll Call #1322 re: Amendment A12 Pittman Second Reading (SB 824)	HOLMES_00007915	HOLMES_00007918		
JX0652	12/5/2018	House Roll Call Vote Transcript for Roll Call #1320 re: Amendment A11 Graham, C. Second Reading (SB 824)	HOLMES_00007919	HOLMES_00007922		
JX0653	12/5/2018	House Roll Call Vote Transcript for Roll Call #1319 re: Amendment A10 Lewis Second Reading (SB 824)	HOLMES_00007923	HOLMES_00007926		
JX0654	12/5/2018	House Roll Call Vote Transcript for Roll Call #1318 re: Amendment A9 Pittman Second Reading (SB 824)	HOLMES_00007927	HOLMES_00007930		
JX0655	12/5/2018	House Roll Call Vote Transcript for Roll Call #1317 re: Amendment A7 Lewis Second Reading (SB 824)	HOLMES_00007931	HOLMES_00007934		
JX0656	12/5/2018	House Roll Call Vote Transcript for Roll Call #1316 re: Amendment A6 Warren Second Reading (SB 824)	HOLMES_00007935	HOLMES_00007938		
JX0657	12/5/2018	House Roll Call Vote Transcript for Roll Call #1315 re: Amendment A5 Warren Second Reading (SB 824)	HOLMES_00007939	HOLMES_00007942		
JX0658	12/5/2018	House Roll Call Vote Transcript for Roll Call #1314 re: Amendment A4 Floyd Second Reading (SB 824)	HOLMES_00007943	HOLMES_00007946		
JX0659	12/5/2018	House Roll Call Vote Transcript for Roll Call #1313 re: Amendment A3 Fisher Second Reading (SB 824)	HOLMES_00007947	HOLMES_00007950		
JX0660	12/5/2018	House Roll Call Vote Transcript for Roll Call #1312 re: Amendment A2 Beasley Second Reading (SB 824)	HOLMES_00007951	HOLMES_00007954		
JX0661	12/5/2018	House Roll Call Vote Transcript for Roll Call #1310 re: Amendment A1 Harrison Second Reading (SB 824)	HOLMES_00007955	HOLMES_00007958		
JX0662	11/29/2018	Senate Roll Call Vote Transcript for Roll Call #811 re: Third Reading of SB 824	HOLMES_00007959	HOLMES_00007961		
JX0663	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #810 re: Second Reading of SB 824	HOLMES_00007962	HOLMES_00007964		
JX0664	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #809 re: Amendment 11 (SB 824)	HOLMES_00007965	HOLMES_00007967		
JX0665	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #808 re: Amendment 10 (SB 824)	HOLMES_00007968	HOLMES_00007970		
JX0666	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #807 re: Amendment 9 (SB 824)	HOLMES_00007971	HOLMES_00007973		
JX0667	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #806 re: Amendment 8 (SB 824)	HOLMES_00007974	HOLMES_00007976		
JX0668	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #805 re: Amendment 7 (SB 824)	HOLMES_00007977	HOLMES_00007979		
JX0669	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #804 re: Amendment 6 (SB 824)	HOLMES_00007980	HOLMES_00007982		
JX0670	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #802 re: Amendment 4 (SB 824)	HOLMES_00007983	HOLMES_00007985		
JX0671	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #801 re: Amendment 3 (SB 824)	HOLMES_00007986	HOLMES_00007988		
JX0672	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #800 re: Amendment 2 (SB 824)	HOLMES_00007989	HOLMES_00007991		
JX0673	11/28/2018	Senate Roll Call Vote Transcript for Roll Call #799 re: Amendment 1 (SB 824)	HOLMES_00007992	HOLMES_00007994		
JX0674	12/19/2018	Session Law 2018-144, Senate Bill 824	-	-		
JX0675	12/4/2018	Senate Bill 824, Proposed House Committee Substitute	-	-		
JX0676	12/4/2018	Senate Bill 824, Proposed House Committee Substitute, Version 2	-	-		
JX0677	11/27/2018	Senate Bill 824 as Filed	-	-		
JX0678	12/4/2018	Senate Bill 824 Legislative Fiscal Note	-	-		
JX0679	11/28/2018	Senate Bill 824 Legislative Incarceration Fiscal Note (Revised)	-	-		
JX0680	11/28/2018	Senate Bill 824 Legislative Incarceration Fiscal Note	-	-		
JX0681	12/6/2018	Senate Bill 824, Ratified Bill	-	-		
JX0682	11/27/2018	Senate Bill 824, Version 1	-	-		
JX0683	11/27/2018	Senate Bill 824, Version 2	-	-		
JX0684	11/27/2018	Senate Bill 824, Version 3	=	-		
JX0685	11/27/2018	Senate Bill 824, Version 4	-	-		
JX0686	11/27/2018	Senate Bill 824, Version 5	-	-		
JX0687	12/14/2018	Governor Roy Cooper Objections and Veto Message to SB 824	ē	-		
JX0688	6/11/2020	Transcript of North Carolina House Floor Debate on HB 1169 (Public Assistance IDs), June 11, 2020	HOLMES_00002324	HOLMES_00002397		

		Holmes et al. v. Moore et al., Case No. 18	CVS 15292		
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes
JX0689	5/28/2020	Transcript of North Carolina House Floor Debate on HB 1169 (Public Assistance IDs), May 28, 2020	HOLMES_00002398	HOLMES_00002493	
JX0690	6/11/2020	Transcript of North Carolina Senate Floor Debate on HB 1169 (Public Assistance IDs), June 11, 2020	HOLMES_00002494	HOLMES_00002529	
JX0691	6/10/2020	Transcript of North Carolina Senate Floor Debate on HB 1169 (Public Assistance IDs), June 10, 2020	HOLMES_00002530	HOLMES_00002579	
JX0692	12/14/2020	Expert Report of Ariel White, Ph.D.	-	-	
JX0693	1/20/2021	Rebuttal Report of Ariel White, Ph.D.	-	-	
JX0694	12/14/2020	Expert Report of Dr. Carol Anderson	-	-	
JX0695	12/14/2020	Expert Report of James L. Leloudis II	-	-	
JX0696	1/20/2021	Rebuttal Report of James L. Leloudis II	-	-	
JX0697	1/20/2021	Rebuttal Report of Kevin Quinn, Ph.D.	-	-	
JX0698	11/9/2020	Objections and Responses of Legislative Defendants to Plaintiffs' First Requests for Admission	-	-	
JX0699	11/13/2020	Amended Objections and Responses of Legislative Defendants to Plaintiffs' Request for Admission No. 56	-	-	
JX0700	11/9/2020	State Defendants' Responses to Plaintiffs' First Set of Requests for Admission	-	-	
JX0701	11/12/2020	State Defendants' Amended Response to Plaintiffs' Request for Admission No. 56	-	-	
JX0702	6/27/2019	Legislative Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories			
JX0703	9/18/2019	Legislative Defendants' Responses and Objections to Plaintiffs' Second Set of Interrogatories			
JX0704	9/25/2019	Legislative Defendants' Responses and Objections to Plaintiffs' Third Set of Interrogatories			
JX0705	10/31/2019	Legislative Defendants' Supplemental Responses and Objections to Plaintiffs' Third Set of Interrogatories			
JX0706	10/30/2020	Legislative Defendants' Second Supplemental Responses and Objections to Plaintiffs' Third Set of Interrogatories			
JX0707	10/7/2019	State Defendants' Responses to Plaintiffs' First Set of Interrogatories			
JX0708	11/6/2019	State Defendants' Responses to Interrogatories 4-10 of the Plaintiffs' First Set of Interrogatories			
JX0709	11/6/2019	State Defendants' Responses to Plaintiffs' Second Set of Interrogatories			
JX0710	2/3/2021	North Carolina DMV Office Locations, as of February 3, 2021	-	-	
JX0711	-	North Carolina Department of Transportation, "Public Transportation Strategic Plan"	-	-	
JX0712	2/3/2021	Hours and Locations of Different County Board of Elections, County BOE Information, as of February 3, 2021	-	-	
JX0713	Oct-19	North Carolina DHHS Division of Public Health, "North Carolina Resident Population Health Data by Race and Ethnicity"	-	-	
JX0714	3/17/2020	North Carolina DMV Press Release, "NCDMV Announces Driver License Office Changes during COVID-19 Outbreak"	-	-	
JX0715	9/14/2020	"Official NCDMV: State IDs" webpage	-	-	
JX0716	10/3/2018	Email from J. Lawson to M. Coggins (Rep. David Lewis) et al. re: [External] FW: Number of Free ID Cards issued Attachment: 2016 Reasonable Impediment Data Attachment: 2016 Primary Provisional Reason Data	Holmes_SBOE_POD_024638	Holmes_SBOE_POD_024641	
		Email from K. Love to N. Inman (Rep. David Lewis) et al. re: Update on requests for approval of			
	10/21/2019	student and employee photo IDs	Holmes_SBOE_POD_024768	Holmes_SBOE_POD_024770	
JX0717		Attachment: List of New Applications Received Spreadsheet			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
	8/13/2019	Email to P. Cox et al. re: FW: Holmes Discovery Attachment: April 2013 SBOE-DMV ID Analysis Attachment: November 2014: State Board of Elections Analysis of Division of Motor Vehicles Data Attachment: Opinion in NC State Conference of the NAACP et al. v. McCrory et al.	Holmes_SBOE_POD_025864	Holmes_SBOE_POD_026374		
JX0718		Attachment: Postage Statement - Nonprofit Standard Mail				
JX0719	1/31/2018	Email from B. Neesby to P. Gannon et al. re: [External] RE: NC Voters that don't have ID Attachment: November 2014: State Board of Elections Analysis of Division of Motor Vehicles Data Attachment: April 2013 SBOE-DMV ID Analysis	Holmes_SBOE_POD_028887	Holmes_SBOE_POD_028909		
JX0720	2/18/2019	Email from T. Fitzgerald to R. Terry et al. re: [External] Campus ID Card as Valud Voter ID	Holmes_SBOE_POD_046554	Holmes_SBOE_POD_046554		
JX0721	12/14/2020	"CFCC Enrolled Students as of 9-30-20 - CE and CU - Excludes those opting out of directory information.xlsx" (854KB), manually cleaned to "CFCC_ready.xlsx" (953KB)				
JX0722	12/14/2020	"HIGHLY CONFIDENTIAL - Production Requests 1 and 4.xlsx" (1.4MB), manually cleaned to "DHHS_ready.xlsx" (1.4MB)				
JX0723	12/14/2020	"OSHR_dataset.xlsx" (8.2MB), manually cleaned to "OSHR_ready.xlsx" (8.2MB)				
JX0724	12/14/2020	"NONPARTY HIGHLY CONFIDENTIAL Amended Ex. A to DiGrazia Affidavit.xlsx" (2.7MB), manually cleaned to "UNCCH_ready.xlsx" (6.8MB)				
JX0725	11/19/2020	Isothermal Community College Employee Directory Data	ICC_0000064	ICC_0000064		
JX0726	6/22/2015	General Assembly of NC Session 2015 HB836 Ratified Bill				
JX0727	12/27/2015	HB 836 Bill History				
JX0728	-	NC SBOE Be Seen. Be Heard. Mailing				
JX0729	-	Draft of Election Official Manual				
JX0730		Preparing for Voter ID in 2016 Presentation, Voter Information Seminar (Final)				
JX0731 JX0732		Bring It PSA Video				
JX0732 JX0733		NC Election Official Training - Voter ID Video NC Election Official Training - Reasonable Impediment				
JX0733 JX0734		NC SBOE Voting Site Procedures Presentation				
JX0735		VIVA Presentation - Preparing for Voter ID in 2016, NC Directors Conference (Final)				
JX0736		NC Voting Site Station Guide Final				
JX0737		Poll Worker Training Presentation				
JX0738		Transcript of Be Seen. Be Heard. Video				
JX0739		BE Recognized, Voter ID Reasonable Impediment, 30 second TV PSA				
JX0740		BE Recognized, Voter ID Reasonable Impediment, 60 second TV PSA				
JX0741		NC Voter ID Wall Poster				
JX0742		NC Voter ID Push Card				
JX0743	10/20/2015	Vote NC FAQs				
JX0744	10/20/2015	Vote NC NCSBE				
JX0745		2016 Primary Election Voter Guide				
JX0746	12/1/2018	[Highly Confidential] Email	P000405.1-P000405.7			
JX0747	11/20/2018	[Highly Confidential] Bill Draft	P000595.1-P000595.13			
JX0748	3/11/2013	[Highly Confidential] Senate Bill	P000904.1-P000904.4			
JX0749	-	[Highly Confidential] Talking Points	P000927.1-P000927.4			
JX0750	11/19/2019	[Highly Confidential] Bill Draft	P001022.1-P001022.12			
JX0751	12/20/2018	[Highly Confidential] Email	P001042.1-P001042.1			
JX0752 JX0753	6/28/2018 11/16/2018	[Highly Confidential] Email	P001169.1-P001169.3			
JX0754	11/16/2018	[Highly Confidential] Bill Draft	P001932.1-P001932.12 P002021.1-P002021.13			
JAU/34	11/13/2018	[Highly Confidential] Bill Draft	PUUZUZ1.1-PUUZUZ1.13			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
JX0755	11/27/2018	[Highly Confidential] Email	P002051.1-P002051.2			
JX0756	11/27/2018	[Highly Confidential] Bill Draft	P002497.1-P002497.16			
JX0757	12/3/2018	[Highly Confidential] Email	P002578.1-P002578.2			
JX0758	11/20/2018	[Highly Confidential] Letter	P002677.1-P002677.1			
JX0759	2018	[Highly Confidential] Bill Amendment	P002681.1-P002681.1			
JX0760	2018	[Highly Confidential] Bill Amendment	P002682.1-P002682.1			
JX0761	2018	[Highly Confidential] Bill Amendment	P002683.1-P002683.1			
JX0762	2018	[Highly Confidential] Bill Amendment	P002684.1-P002684.2			
JX0763	2017	[Highly Confidential] House Bill Draft	P002762.1-P002762.16			
JX0764	11/26/2018	[Highly Confidential] Email	P002822.1-P002822.2			
JX0765	11/20/2018	[Highly Confidential] Email	P002827.1-P002827.2			
JX0766	· ·	House Subcommittee Concurrence Against Tabling Bill (Dec. 6, 2018), http://bit.ly/3qX9xsl				
JX0767		House Vote to Fail Amendment A3 (Dec. 5, 2018), https://bit.ly/36yAYRV				
JX0768		Senate Vote to Fail Motion to Table Bill (Nov. 28, 2018), http://bit.ly/36hjysG				
JX0769		Senate Vote to Fail Motion to Table Bill (Dec. 6, 2018), http://bit.ly/36gXfTP				
JX0770		Senate Vote to Pass Amendment Tabled A7 (Nov. 28, 2018), http://bit.ly/2Yk1RVa				
JX0771	11/26/2018	Transcript of November 26, 2018 Joint Elections Oversight Committee (SB 824)	HOLMES 00002099	HOLMES 00002148		
JX0772	11/28/2018	Transcript of November 28, 2018 Senate Floor - 2nd Reading (SB 824)	HOLMES 00002073	HOLMES 00002098		
JX0773	11/29/2018	Transcript of November 29, 2018 Senate Floor - 3rd Reading (SB 824)	HOLMES 00002048	HOLMES 00002051		
JX0774	12/3/2018	Transcript of House Elections Committee (SB 824)	HOLMES 00002052	HOLMES 00002072		
JX0775	12/4/2018	Transcript of Pecember 4, 2018 House Rules Committee (SB 824)	HOLMES 00002026	HOLMES 00002047		
JX0776	12/4/2018	Transcript of December 4, 2018 House Elections and Ethics Committee (SB 824)	HOLMES 00002232	HOLMES 00002280		
JX0777	12/5/2018	Transcript of December 5, 2018 House Floor Audio - 2nd and 3rd Reading (SB 824)	HOLMES 00002149	HOLMES 00002226		
JX0778	12/6/2018	Transcript of December 6, 2018 Senate Floor - Concurrence (SB 824)	HOLMES 00002227	HOLMES 00002231		
JX0779	12/18/2018	Transcript of December 18, 2018 Senate Floor Audio - Veto Override (SB 824)	HOLMES 00002227	HOLMES 00002231		
JX0780	12/19/2018	Transcript of December 19, 2018 House Floor Audio - Veto Override (SB 824)	HOLMES 00001989	HOLMES 00002017		
JX0781	12/13/2010	House Bill 589 Version 9 (Final Enacted Law) (Aug. 12, 2013), https://bit.ly/36LgrcS	110214123_00001303	110EWES_00002017		
JX0782		Senate Bill 214 Version 4 (Final Enacted Law) (Mar. 13, 2019), https://bit.ly/3trfWhM				
JX0783		Senate Bill 683 Version 8 (Final Enacted Law) (Nov. 6, 2019), https://bit.ly/36LgHbQSL				
JX0784		Expert Rebuttal Report of M.V. Hood, III (Jan. 20, 2021)				
JX0785		Expert Report of Kimberly Strach (Dec. 14, 2020)				
JX0786		Declaration of Kimberly Westbrook Strach and attached exhibits (Dec. 11, 2015)				
JX0787		Declaration of Kimberly Westbrook Strach and accented exhibits (Bec. 11, 2015)				
JX0788		PowerPoint Training, N.C. STATE BOARD OF ELECTIONS (Feb. 1, 2016)				
JX0789		2017 Legislative Update PowerPoint, N.C. STATE BOARD OF ELECTIONS				
3/10703		NC State Board of Election 2018 Legislative PowerPoint Presentation				
JX0790		(Holmes SBOE POD 067471-067505)				
3,0730		Numbered Memo 2016-04, N.C. STATE BD. OF				
JX0791		ELECTIONS, (March 11, 2016)				
3,10731		Numbered Memo 2016-09, N.C. STATE BD. OF				
JX0792		ELECTIONS, (June 6, 2016) (revised June 7, 2016)				
3/10/32		State Board office approves IDs for voting purposes, supports legislative changes to allow more				
		IDs to qualify, N.C. STATE BD. OF ELECTIONS, (March 15,				
JX0793		2019), http://bit.ly/3t2x0KM				
JX0794		Affidavit of Brian Neesby, Currie v. State of North Carolina, (June 8, 2015)				
JX0794 JX0795		Expert Rebuttal Report of Kimberly Strach (Jan. 20, 2021)				
3/10/33		Numbered Memo 2016-01, Reasonable Impediment Challenge Procedures, N.C.				
		STATE BD. OF ELECTIONS (Feb. 10, 2016),				
JX0796		https://bit.ly/3itZPuF				
3/10/30		IIILP3.//DIL.IY/DILEFUF				

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
Itamber		CONFIDENTIAL-Holmes_SBOE_POD_013790-				
JX0797		013817-Reasonable Impediment Declarations-(All)- March 2016.pdf				
		Holmes_SBOE_POD_003996- HIGHLYCONFIDENTIAL-				
JX0798		provisional_voter_20160602				
		Holmes_SBOE_POD_000651- HIGHLYCONFIDENTIAL-				
JX0799		provisional_voter_extended_20160420				
JX0800		Expert Rebuttal Report of Dr. Janet Thornton (Jan 20, 2021)				
JX0801		Voter History Data, N.C. STATE BD. OF ELECTIONS, https://bit.ly/36eWsmG				
		Voter History Data, History_stats_20160315, N.C. STATE BD. OF ELECTIONS,				
JX0802		https://bit.ly/3pT1n4p (Select "3/15/2016 .zip" under the table "Historical Voter History Stats")				
		Voter History Data, Ncvhis_Statewide.txt, N.C. STATE BD. OF ELECTIONS, https://bit.ly/3pT1n4p				
		(Select "(Statewide) .zip" under the table "Current Voter History Data")				
JX0803						
		2018 Demographics Profile of the Military Community, MILITARY ONE SOURCE,				
JX0804		https://bit.ly/3pkDi6k				
		NCSBE 2020 Year-End Wrap Up, N.C. STATE BD. OF				
JX0805		ELECTIONS, https://bit.ly/3om2yHK				
JX0806		Highly Confidential Voter Registration File produced by the State Defendants				
JX0807		Expert Report of Keegan Callanan (Dec. 14, 2020)				
		Current Employment Statistics (CES), N.C. DEP'T OF COMMERCE LABOR & ECON. ANALYSIS,				
JX0808		https://bit.ly/3qFAeml				
		Selected Population Profile In The United States, U.S. CENSUS BUREAU (2019),				
JX0809		https://bit.ly/39XSEIT				
		Voter Registration Statistics, N.C. STATE BD. OF ELECTIONS (Nov. 14, 2020),				
JX0810		https://bit.ly/37RG8lv				
JX0811		State Employee Statistics, N.C. OSHR (Nov. 2020), https://bit.ly/3qJWdsj				
		Profile of Federal Civilian Non-Postal Employees, OFF. OF PERSONNEL MGMT. (Sept. 30, 2017),				
		https://bit.ly/2DgVGHo				
JX0812		5 + 2 + 4 + 1 2 + 5 (4 + 2 + 2 + 2 + 2 + 2 + 2 + 2 + 2 + 2 +				
JX0813		Expert Rebuttal Report of Keegan Callanan (Jan. 20, 2021)			_	
		Session Dates of Congress, List of All Sessions, HISTORY, ART & ARCHIVES: UNITED STATES				
JX0814		HOUSE OF REPRESENTATIVES (June 17, 2019, 9:20 AM),				
JX0814 JX0815		https://bit.ly/2WMgMEn Affidavit of Keegan Callanan (June 18, 2019)				
170912		In the Matter of Confidential Investigation, No. R84-11 (N.Y. Sup. Ct. 1984),		-	+	
JX0816		https://bit.ly/2KmywnP				
370810		Geographical Mobility: 2015 to 2016, UNITED STATES CENSUS BUREAU (2016), Table 1, (Nov.		+		
		2016)				
JX0817		https://bit.ly/39JPat1				
3,,001/		Acceptable Photo IDs for Voting in 2020 , N.C. STATE BD. OF ELECTIONS, https://bit.ly/2W1ixzB				
JX0818		, receptable , noto 103 joi voting in 2020 , N.C. STATE BD. OF ELECTIONS, Https://DIC.ly/20011X2D				
		Order, In the Matter of : Investigation of Election Irregularities Affecting Counties Within the		<u> </u>	†	
JX0819		9 th Congressional District (Mar. 13, 2019), https://bit.ly/3t0smwD				
JX0820		State Employee Stats , N.C. OSHR (Nov. 2020), https://bit.ly/3gJWdsj				
37.0020		Selected Population Profile In The United States , U.S. CENSUS BUREAU, https://bit.ly/3oobtZw			-	
JX0821		Selected topulation Frogine in the officed states, O.S. CENSOS BONEAU, Https://bit.iy/3000t2W				
JX0822		Pl. Fred Culp's Resps. to Legislative Defs.' First Set of Discovery Requests (Mar. 18, 2019)				
JX0823		Pl. Fred Culp's Resps. to Legislative Defs.' Third Set of Interrogatories (July 6, 2020)				
37.0023		It it they early a nearlys, to registative pers. Third aet of filterrogatories (July 0, 2020)		<u> </u>	<u> </u>	

Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes
JX0824		Pl. Jabari Holmes's Resps. to Legislative Defs.' First Set of Discovery Requests (Mar. 18, 2019)			
JX0825		Pl. Jabari Holmes's Resps. to Legislative Defs.' Third Set of Interrogatories (July 6, 2020)			
JX0826		Pl. Paul Kearney Sr.'s Resps. to Legislative Defs.' First Set of Discovery Requests (Mar. 18, 2019)			
JX0827		Pl. Brendon Jaden Peay's Resps. to Legislative Defs.' First Set of Discovery Requests (Mar. 25, 2019)			
JX0828		Pl. Daniel E. Smith's Resps. to Legislative Defs.' First Set of Discovery Requests (Mar. 25, 2019)			
JX0829		Pls.' Resps. to Legislative Defs.' Second Set of Discovery Requests (Sept. 23, 2019)			
JX0830		Pls.' Resps. to Legislative Defs.' Third Set of Discovery Requests (Nov. 12, 2020)			
JX0831		Pls.' Responses to Legislative Defs.' First Set of Requests for Admission (Nov. 12, 2020) State Defendants' Resps. to Legislative Defs.' First Set of Requests for Admission (Nov. 12,			
JX0832		2020)			
JX0833		State Defendants' Resps. to Plaintiffs' First Set of Requests for Admission (Nov. 9, 2020)			
JX0834		State Defendants' Amended Resp. to Plaintiffs' Request for Admission No. 56 (Nov. 12, 2020)			
JX0835		State Board's Resps. to Legislative Defs' First Set of Interrogatories (April 22, 2019)			
JX0836		State Board's Resps. to Legislative Defs' Second Set of Interrogatories (Sept. 23, 2019)			
JX0837		Crawford v. Marion County Election Bd. , 553 U.S. 181 (2008)			
JX0838		North Carolina State Conference of NAACP v. McCrory , 831 F.3d 204 (4th Cir. 2016)			
JX0839		North Carolina State Conference of NAACP v. McCrory , 182 F. Supp.3d 320 (M.D.N.C. 2016)			
JX0840		Lee v. Virginia State Board of Elections , 843 F.3d 592 (4th Cir. 2016)			
JX0841		South Carolina v. United States , 898 F. Supp.2d 30 (D.D.C. 2012)			
JX0842		Official General Election Results – Statewide, N.C. STATE BOARD OF ELECTIONS (Nov. 6, 2018), http://bit.ly/2YHALaC			
JX0843		Judicial Voter Guide 2018, N.C. STATE BD. OF ELECTIONS & ETHICS ENFORCEMENT, https://bit.ly/2MD773E			
JX0844		2018 Constitutional Amendments as adopted by the N.C. Constitutional Amendments Publication Commission , N.C. STATE BD. OF ELECTIONS, https://bit.ly/3oPBzou			
JX0845		Official Republican Primary Election Results by Voting Method – Statewide, N.C. STATE BD. OF ELECTIONS (Mar. 15, 2016), https://bit.ly/3twCwFC			
JX0846		Official Democrat Primary Election Results by Voting Method – Statewide, N.C. STATE BD. OF ELECTIONS (Mar. 15, 2016), https://bit.ly/3ttY7P8			
JX0847		Official Libertarian Primary Election Results by Voting Method – Statewide , N.C. STATE BD. OF ELECTIONS (Mar. 15, 2016), https://bit.ly/3pTIoGL			
JX0848		Jurisdictions Previously Covered By Section 5, U.S. DEP'T OF JUSTICE (updated Sept. 11, 2020), http://bit.ly/36HFBZY			
JX0849		Press Release, N.C. State Bd. of Elections, County Boards of Elections Begin Regular Voter List Maintenance Processes (Jan. 14, 2021), http://bit.ly/3rnShwR			
JX0850		Veasey v. Abbott , 888 F.3d 792 (5th Cir. 2018)	<u> </u>		
JX0851		Common Cause/Georgia v. Billups , 554 F.3d 1340 (11th Cir. 2009)			
JX0852		Voting Determination Letters for North Carolina , U.S. DEP'T OF JUSTICE (last updated Aug. 7, 2015), http://bit.ly/3cNGyUp			
JX0853		Section 5 Changes by Type and Year , U.S. DEP'T OF JUSTICE (last updated Aug. 6, 2015), http://bit.ly/2MVcg74			

	Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Joint Exhibit Number	Date	Document Description	BegBates	EndBates	Parties' Notes	
		Section 4 of the Voting Rights Act , U.S. DEP'T OF				
JX0854		JUSTICE (last updated May 5, 2020), http://bit.ly/2YHPkea				
		NORTH CAROLINA MANUAL, 324–28				
JX0855		(1921), http://bit.ly/3axi52N				
JX0856		Email dated 12/1/2018 (P000182.1) (Highly Confidential)				
JX0857		Email dated 11/14/2018 (P000194.1-192.1) (Highly Confidential)				
JX0858		Voter ID Floor Talking Points (P000927.1-927.4) (Highly Confidential)				
JX0859		Email dated 11/28/2018 (P000987.1-987.8) (Highly Confidential)				
JX0860		Letter dated 11/20/2019 (P002677.1) (Highly Confidential)				
JX0861		Email dated 11/27/2018 (P000226.1-226.2) (Highly Confidential)				
JX0862		Bill Draft 2017-BK-23 [v.1] dated 11/20/2018 (P000595.1-595.13) (Highly Confidential)				
JX0863		Bill Draft 2017-BK-21 [v.1] dated 11/15/2018 (P002021.1-2021.13) (Highly Confidential)				
JX0864		Bill Draft 2017-BKf-26 [v.1] dated 11/27/2018 (P002497.1-2497/16) (Highly Confidential)				
JX0865		Email dated 11/27/2018 (P002046.1-2046.6) (Highly Confidential)				
JX0866		Email dated 11/27/2018 (P002059.1-2059.3) (Highly Confidential)				
JX0867		Email dated 12/6/2018 (P000384.1-384.2 (Highly Confidential)				
JX0868		House Bill 836, Session Law 2015-103				
JX0869		DMV Office Locations				
		Docket No. 20-1092 - 4th Circuit Opinion				
JX0870		reversing Preliminary Injunction				
		Docket No. 1:18CV1034 - M.D.N.C.				
JX0871		Preliminary Injunction Order				
JX0872		N.C. State Conf. of the NAACP v. McCrory, 831 F.3d 204 (4th Cir. 2016)				
JX0873		NCSL Voter Identification Requirements re: Voter ID Laws				
JX0874		Certification of NC Constitutional Amendments 11-8-2018				
JX0875		NC General Assembly Consolidated Hearing Transcripts				
JX0876		NCGA Official Record of SB 824				
JX0877		June 17 2019 SBE Correspondence				
JX0878		Strach Presentation to Legislature 2018				
JX0879		SB 824 Legislative History				
JX0880		Brian Neesby NAACP Affidavit and Supporting Exhibits				
JX0881		Dec 2019 ID Approvals				
JX0882		February 13 2019 - Voter ID Intro PDF				
JX0883		Seminar Venue Info				
JX0884		April 24 2019 - WEBINAR Voter Photo ID Rules				
JX0885		Quick Guide for BODNO Card Printers				
JX0886		Summary of new voter ID rules for absentee by mail voting and litigation update				
JX0887		Seminar Training Printed Public Guide				
JX0888		Voter ID approval form - employee ID				
JX0889		Voter ID approval form - student ID				
JX0890		Voter ID infosheet - College Students				
JX0891		Voter ID infosheet - Voter ID 2019 in Spanish				
JX0892		Voter ID infosheet - Voter ID 2019				
JX0893		Voter ID infosheet HALF bw				
JX0894		Voter ID infosheet HALF bw in Spanish				
JX0895		Voter ID letter - College University ID Instructions				
JX0896		Voter ID letter – Government Employer ID Instructions				
JX0897		April 2019 Voter ID Poster				
JX0898		April 2019 Voter ID Request				
JX0899		Applications for the Approval of Student and Employee ID Cards for Voting in 2020		1		

Holmes et al. v. Moore et al., Case No. 18 CVS 15292							
Joint	D	B. (B.)	5.40.4	B. d'. d Note.			
Exhibit Da Number	te Document Description	BegBates	EndBates	Parties' Notes			
JX0900	Numbered Memo 2019-08						
JX0901	March 20 2019 - Voter ID PDF						
JX0902	NC Voter Registration Form						
JX0903	August 2019 No Match Mailer						
JX0904	Team Legal July 2019 Presentation						
JX0905	Voter ID Election Director Presentation						
JX0906	Voter ID Website Screenshots						
JX0907	Voter ID Combined Handouts						
JX0908	2015 8 N.C.A.C. 17.0101						
JX0909	2015 8 N.C.A.C. 17.0102						
JX0910	2015 8 N.C.A.C. 17.0103						
JX0911	2015 8 N.C.A.C. 17.0104						
JX0912	2015 8 N.C.A.C. 17.0105						
JX0913	2016 8 N.C.A.C. 17.0106						
JX0914	County Photo ID Proposed Permanent Rule						
JX0915	SL 2020-17						
JX0916	March 20 2019 - Voter ID PDF						
JX0917	Meeting Notice 2019-02-07						
JX0918	Meeting Notice 2019-04-04						
JX0919	Meeting Notice 2019-06-13						
JX0920	Meeting Notice 2019-10-18						
JX0921	Photo ID Rules as of February 2021						
JX0922	Photo ID Rules as of October 2019						
JX0923	SL 2013-381						
JX0924	SL 2015-103						
JX0925	SL 2018-144						
JX0926	SL 2019-4						
JX0927	SL 2019-22						
JX0928	2015 SBE Fitzgerald Presentation						
JX0929	Numbered Memo 2016-01						
JX0930	Numbered Memo 2016-04						
JX0931	Numbered Memo 2016-05						
JX0932	Sample Reasonable Impediment Form - March 2016 Redacted						
JX0933	February 2016 SBE Presentation on Photo ID						
JX0934	Legislative Defendants' Amended Response to Request for Admissions 56						
JX0935	State Defendants' Responses to Legislative Defendants' 1st Set of Request for Admissions						
JX0936	State Defendants' Responses to Plaintiffs' 1st Set of Request for Admissions						
JX0937	State Defendants' Amended Response to Request for Admissions 56						
JX0938	Legislative Defendants' Objections and Responses to Plaintiffs' First Requests for Admissions						
	Plaintiffs' Objections and Responses to Legislative Defendants' First Requests for Admissions						
JX0939							
JX0940	Correspondence to Co-Chairs 2019-03-15						
JX0941	Reasonable Impediment Forms - Henderson County	Holmes_SBOE_POD_129468	Holmes_SBOE_POD_129475				

EXHIBIT 3 - Plaintiffs' Exhibit List

		Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0001	5/1/2014	Declaration of Joshua Stein (COLOR), 5/1/14	-	-	402, 403, 701, 802, 805; lacks foundation	
PX0002	6/13/2019	Affidavit of Mary Desouza in <i>Holmes et al.</i> v. <i>Moore et al.</i>	Holmes_0 0000630	Holmes_0 0000632	402, 403, 802, 805	
PX0003	6/18/2019	Missy deSouza (@MissyTD) Twitter Page	Holmes_0 0000633	Holmes_0 0000726	402, 403, 802, 805	802
PX0004	6/14/2019	Affidavit of Linda Devore in Holmes et al. v. Moore et al.	Holmes_0 0000455	Holmes_0 0000458	402, 403, 802, 805	802
PX0005	6/17/2019	Affidavit of Joel Ford in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00000727			802
PX0006	12/13/2018	Longleaf Politics article by Andrew Dunn, "Joel Ford becoming a bipartisan leader"	HOLMES_ 00000740	HOLMES_ 00000742	402, 403, 802 ,805	
PX0007	1/24/2019	Excerpt of Deposition of Kim Strach in <i>Holmes et al.</i> v. <i>Moore et al.</i>	Holmes_0 0001221	Holmes_0 0001228	Violates agreement re deposition designations; 106	
PX0008	6/22/2019	Transcript of Deposition of M.V. Hood. in <i>Holmes</i> et al. v. <i>Moore et al.</i>	-	-	Violates parties agreement re deposition designations; 106	
PX0009	3/25/2013	Spreadsheet of Racial Data Prepared at the Request of Rep. D. Lewis	-	-	LDs object. 106, 402, 403, 602. 705	
PX0010	5/15/2019	Affidavit of Christopher Dalton Ketchie in <i>Holmes</i> et al. v. <i>Moore et al.</i>	Holmes_0 0000805	Holmes_0 0000828	N.C. R. Civ. P. 26; 601, 602, 702, 802, 805	
PX0011	6/14/2019	Affidavit of Keith Weatherly in <i>Holmes et al.</i> v. <i>Moore et al.</i>	Holmes_0 0000526	Holmes_0 0000529	402, 403, 802	
PX0012	8/14/2013	NC Voter ID Bill Moving Ahead with Supreme Ruling, article	-	-	402, 403, 802, 805; lacks foundation	
PX0013	9/17/2018	Wake County Meeting Minutes of the Board of Commissioners	Holmes_0 0000530	Holmes_0 0000553	402, 403, 802.	

		Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0014	7/1/2014	Transcript of Deposition of Kim Westbrook Strach - Volume II	SBOE_POD	SBOE_POD	Violates parties agreement on deposition designations; 402, 403,	
PX0015	1/25/2021	L2 Data Files, North Carolina Voter File from 2017, "NC20171_Export.tab"	1	-	402, 403, 602, and 802, 901	
PX0016	1/25/2021	L2 Data Files, South Carolina Voter History File from 2017, "SC20171_Expor.tab"	1	-	402, 403, 602, and 802, 901	
PX0017	1/25/2021	L2 Data Files, North Carolina Voter History File from 2017, "Ncvhis_I2.txt"	-	-	402, 403, 602, and 802, 901	
PX0018	6/23/2011	NC Capitol Article by Laura Leslie, "Perdue vetoes Voter ID" (Exhibit K to Plaintiffs' Motion for a Preliminary Injunction)	-	-	402, 403, 802, 805, lacks foundation	
PX0019	-	Speaker Tillis Comments on H.B. 589, available at http://www.wral.com/news/state/nccapitol/video/12231808/	-	-	402, 403, 802, 805	
PX0020	15-Jun	Annotated Page from E. Churchill Affidavit	-	-	LDs object. 106, 402, 403, 802, 705	
PX0021	5/15/2019	Affidavit of Daniel Smith in <i>Holmes et al.</i> v. <i>Moore et al.</i>	ı	-	LDs object. 802	
PX0022	5/15/2019	Affidavit of Elizabeth Holmes in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00001410	HOLMES_ 00001413	LDs object. 802	
PX0023	5/15/2019	Affidavit of Fred Culp in <i>Holmes et al.</i> v. <i>Moore et al.</i>	-	-	LDs object. 802	
PX0024	5/15/2019	Affidavit of Paul Kearney in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00001456	_	LDs object. 802	
PX0025	5/15/2019	Affidavit of Lynda Benson in <i>Holmes et al.</i> v. <i>Moore et al.</i>	-	-	LDs object. 802	
PX0026	5/15/2019	Affidavit of Mina Ezikpe in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00000245	_	LDs object. 802	

	_	Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0027	5/15/2019	Affidavit of Noah Van Hook in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00000058	HOLMES_ 00000060	LDs object. 802	
PX0028	5/15/2019	Affidavit of Pricey Harrison in Holmes et al. v. Moore et al.	-	-	LDs object. 802	
PX0029	5/15/2019	Affidavit of Senator Mike Woodward in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00001982	HOLMES_ 00001988	LDs object. 802	
PX0030	5/15/2019	Affidavit of Representative Ben Clark in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00000397	HOLMES_ 00000402	LDs object. 802	
PX0031	5/15/2019	Affidavit of Greg Flynn in Holmes et al. v. Moore et al.		HOLMES_ 00001388	LDs object. 802	
PX0032	5/15/2019	Affidavit of John Quinn in <i>Holmes et al.</i> v. <i>Moore</i> et al.	-	-	LDs object. 802	
PX0033	5/15/2019	Affidavit of Noah Read in Holmes et al. v. Moore et al.	_	HOLMES_ 00001920	LDs object. 802	
PX0034	5/15/2019	Affidavit of Courtney Patterson in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00001491	HOLMES_ 00001496	LDs object. 802	
PX0035	5/15/2019	Affidavit of Isela Gutierrez in <i>Holmes et al.</i> v. <i>Moore et al.</i>	HOLMES_ 00000148	HOLMES_ 00000150	LDs object. 802	
PX0036	5/15/2019	Affidavit of Kate Fellman in Holmes et al. v. Moore et al.	HOLMES_ 00001255	HOLMES_ 00001259	LDs object. 802	
PX0037	2/5/2015	Charles Stewart III, "2014 Survey of the Performance of American Elections"	-	-	802, 805	
PX0038	2016	Charles Stewart III, "2016 Survey of the Performance of American Elections"	-	-	802, 805	
PX0039	Apr-17	Zoltan Hajnal, Nazita Lajevardi, and Lindsay Nielson, "Voter Identification Laws and the Suppression of Minority Votes," Journal of Politics	-	-	402, 403, 802 ,805	802, 701

	_	Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0040	6/3/2020	Hannah Klain, Kevin Morris, Max Feldman, and Rebecca Ayala, "Waiting to Vote: Racial Disparities in Election Day Experiences," Brennan Center for	-	-	402, 403, 802 ,805	802, 701
PX0041	11/29/2020	"When Debt Takes the Wheel," North Carolina Equal Access to Justice Commission	-	-	402, 403, 802 ,805	802, 701
PX0042	2019	"Evaluating Racial Disparities in the North Carolina Balance of State CoC"	-	-	Not produced in discovery; 402, 403, 802, 805, 901, 701, 702	
PX0043	3/15/2019	Letter from I. Gutiérrez to K. Love re: Democracy North Carolina Comment on Temporary Rules 08 NCAC 17.0107 and 08 NCAC 17.0108	-	-	Not produced in discovery; 402, 403, 802, 805, 901	802
PX0044	11/29/2020	Alexandra F. Sirota, "2019 Poverty Report: Fight Poverty, Promote Prosperity for North Carolina," North Carolina Justice Center	-	-	Not produced in discovery; 402, 403, 802, 805, 901, 701, 702	402, 403, 802
PX0045	2015	Tazra Mitchell, "North Carolina's Greatest Challenge: Widespread Struggles Remain a Grave Threat to Economic Growth and Us All," North	-	-	Not produced in discovery; 402, 403, 802, 805, 901, 701, 702	402, 403, 802
PX0046	2/24/2016	Technician Online Article by Logan Graham, "COLUMN: I tried to get a voter ID card, here is what happened"	-	-	Not produced in discovery; 402, 403, 602, 701, 802, 805,	402, 403, 802, 901
PX0047	12/6/2018	Brennan Center for Justice Article by Kevin Morris and Myrna Pérez, "North Carolina's Election Fiasco Is About Voter Suppression, Not Voter Fraud"	-	-	Not produced in discovery; 402, 403, 802, 805, 901, 701, 702	802, 701
PX0048	9/30/2019	North Carolina Justice Center Article by Brian Kennedy, "North Carolina's poverty rate remains 15th highest in the nation"	-	-	Not produced in discovery; 402, 403, 802, 805, 901, 701, 702	802, 701
PX0049	9/17/2019	Declaration of Floyd B. McKissick, Jr. (Exhibit 5 to the Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction in NC State	-	-	Not produced in discovery; 402, 403, 802, 805	802
PX0050	9/17/2019	Declaration of Robert T. Rieves II (Exhibit 6 to the Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction in NC State	-	-	Not produced in discovery; 402, 403, 802, 805	802
PX0051	9/17/2019	Declaration of Theresa Van Duyn (Exhibit 7 to the Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction in NC State	-	-	Not produced in discovery; 402, 403, 802, 805	802
PX0052	11/15/2019	Supplemental Declaration of Floyd B. McKissick, Jr. (Exhibit B to the Reply in Support of Plaintiff's Motion for a Preliminary Injunction in NC State	-	-	Not produced in discovery; 402, 403, 802, 805	802

	_	Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0053	11/15/2019	Declaration of Kathleen Roblez (Exhibit D to the Reply in Support of Plaintiff's Motion for a Preliminary Injunction in NC State Conference of	-	-	Not produced in discovery; 402, 403, 802, 805	802
PX0054	6/5/2020	Email from K. Love to K. Bell et al. re: Questions from NC Policy Watch	082824	BOE_POD 082825	402, 403, 802, 805	
PX0055	2/3/2020	Email from J. Fishback to K. Bell re: [External] Counties using EVID for next election	_	Holmes_S BOE_POD 070875	402, 403, 802, 805	
PX0056	4/23/2013	Email from J. DeLancy to Rep. T. Murray re If All Else Fails	1	-	106, 402, 403, 802 ,805, lacks foundation	
PX0057	6/17/2013	Email from Sen. T. Goolsby to S. Thompson re Article in Macon News (REDACTED)	-	-	106, 402, 403, 802,805, lacks foundation	
PX0058	5/3/2013	Email from M. Coggins (Rep. D. Lewis) to G. Cappy re Comment on Voter ID Proposals (REDACTED)	-	-	106, 402, 403, 802,805, lacks foundation	
PX0059	3/15/2013	Email from Rep. H. Warrant to J. Rhodes re NC Voter ID Law - Indiana State Photo ID Law Upheld by the US Supreme Court (REDACTED)	-	-	106, 402, 403, 802 ,805, lacks foundation	402, 802, 901
PX0060	4/9/2013	Email from D. Williams to Rep. D. Lewis et al. re Voter ID (REDACTED)	ı	-	402, 403	
PX0061	4/8/2015	Email from Brian LiVecchi to Tracy Bucholtz re DMV Free ID Card Incident - Yancey County	-	-	402, 403, 802 ,805	802
PX0062	4/10/2015	Email from Brian LiVecchi to Jennifer Faulkner re Another possible Scotland Neck DMV Mobile Unit Issue	1	-	402, 403, 802 ,805	802
PX0063	4/13/2015	Email from Brian LiVecchi to Jennifer Faulkner re DMV Mobile Unit Issue	-	-	402, 403, 802 ,805	802
PX0064	9/17/2015	Email from Brian LiVecchi to William Smith, Jennifer Faulkner, Tracy Bucholtz re Greensboro DMV Issue - Cassandra	-	-	402, 403, 802 ,805	802
PX0065	10/13/2015	Email from Brian LiVecchi to Ted Fitzgerald re DMV Voter ID Complaint	-	-	402, 403, 802 ,805	802

		Holmes et al. v. Moore et al., Case No. 1	8 CVS 1529	2		
Ex. No.	Date	Document Description	BegBates	EndBates	LD's Objections	SD's Objections
PX0066	10/31/2015	Email from Brian LiVecchi to Jennifer Faulkner re Voter ID	-	-	402, 403, 802 ,805	802
PX0067	11/4/2015	Email from Brian LiVecchi to Joshua Lawson re clarification as to training for poll workers	-	-	402, 403, 802 ,805	802
PX0068	11/13/2015	Email from Gerry Cohen to Joshua Lawson re Reasonable Impediment Affidavits	-	-	402, 403, 802 ,805	802
PX0069		Senate District 38 Data on Requiring Photo ID to Vote	HOLMES_ 00000739			
PX0070	5/15/2019	March 2016 Primary Provisional Vote Data File of voters who filed Reasonable Impediment Declarations (Exhibit O to Plaintiffs' Motion for a Preliminary Injunction)	-		LDs object. Need more inf	106, 901, 1002
PX0071	9/17/2019	Declaration of Henry M. Michaux, Jr. (Exhibit 3 to the Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction in NC State Conference of the NAACP, et al. v. Cooper, et al.)	-		402, 403, 802, 805	802

EXHIBIT 4 Legislative Defendants' Exhibit List

		Holmes et al. v. Moore et al., Case No. 18 CVS 15292			
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0001		Building Confidence in U.S. Elections, COMM'N ON FED. ELECTION REFORM (Sept. 2005), https://tinyurl.com/y5kqpjjz			402, 802
LX0002		Georgia Voter Identification Requirements, SEC'Y OF STATE OF GA., https://bit.ly/2XiWGpj			402, 403, 802
LX0003		Texas Election Identification Certificates (EIC) – Documentation Requirements, TX. DEPT. OF PUBLIC SAFETY, https://bit.ly/2NVmaWM			402, 403, 802
LX0004		M.V. Hood III & Charles S. Bullock III, Much Ado About Nothing? An Empirical Assessment of the Georgia Voter Identification Statute, 12 STATE POL. AND POL'Y Q., (Dec. 2012)			402, 403, 702, 802
LX0005		M.V. Hood III & Scott E. Buchanan, <i>Palmetto Postmortem: Examining the Effects of the South Carolina Voter Identification Statute</i> , POL. RES. Q. (April 2, 2019)			402, 403, 702, 802
LX0006		Stephen Ansolabehere, The Effects of Identification Requirements on Voting: Evidence from the Experiences of Voters on Election Day , PS: POL. SCI. & POLS., (2009)			702, 802
LX0007		Barry C. Burden et al., <i>Election Laws, Mobilization, and Turnout: The Unanticipated Consequences of Election Reform</i> , AM. J. OF POL. SCI., (2014)			702, 802
LX0008		Robert S. Erikson & Lorraine Minnite, <i>Modeling Problems in the Voter Identification-Voter Turnout Debate</i> , ELECTION L.J., (2009)			702, 802
LX0009		June Andra Gillespie, Voter Identification and Black Voter Turnout, An Examination of Black Voter Turnout Patterns in Georgia, 2000-2014, PHYLON, (2015)			402, 403, 702, 802,
LX0010		Justin Grimmer et al., Obstacles to Estimating Voter ID Laws' Effect on Turnout, J. OF POLS., (2018)			702, 802
LX0011		Zoltan Hajnal et al., 2017 Voter Identification Laws and the Suppression of Minority Votes , J. OF POLS., (2017)			702, 802
LX0012		Benjamin Highton, <i>Voter Identification Laws and Turnout in the United States</i> , ANN. REV. OF POL. SCI., (2017)			702, 802
LX0013		Daniel J. Hopkins et al., Voting But for the Law: Evidence from Virginia on Photo Identification Requirements , J. OF EMPIRICAL LEGAL STUDS., (2018)			402, 403, 702, 802,

		Holmes et al. v. Moore et al., Case No. 18 CVS 15292			
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0014		WILLIAM J. KEEFE & MARC J. HETHERINGTON, PARTIES, POLITICS, AND PUBLIC POLICY IN AMERICA (2003)			402, 403, 702, 802
LX0015		Jason Mycoff et al., <i>The Empirical Effects of Voter-ID Laws: Present or Absent</i> , PS: POL. SCI. & POLS., (2009)			402, 403, 702, 802
LX0016		Rene R. Rocha & Tetsuya Matsubayashi, <i>The Politics of Race and Voter ID Laws in the States: The Return of Jim Crow?</i> , POL. RSCH. Q. (2014)			402, 403, 702, 802
LX0017		Justin Grimmer & Jesse Yoder, <i>The Durable Differential Deterrent Effects of Strict Photo Identification Laws</i> , STANFORD DEP'T OF POL. SCI., (Nov. 16, 2020), https://stanford.io/3bRYj4b			702, 802
LX0018		Rebecca Tippett, Who Are North Carolina's Unaffiliated Voters: 2020 Update, CAROLINA DEMOGRAPHY (Sept. 8, 2020), https://bit.ly/36g81d1			802
LX0019		Megan J. Benetsky et al., Young Adult Migration: 2007- 2009 to 2010-2012, (March 2015), https://bit.ly/2MppGlf			402, 403, 802
LX0020		Frankie Patman & Leonard Shaefer, Is Soundex Good Enough for You? On the Hidden Risks of Soundex- Based Name Searching, (2001), https://bit.ly/3iNw73S			402, 403, 802
LX0021		What is Soundex and How Does Soundex Work, GENEALOGYINTIME MAG., https://bit.ly/3qYx38H			402, 403, 802
LX0022		Rebecca Tippett, NC in Focus: 2019 Veterans Snapshot, CAROLINA DEMOGRAPHY, (Nov. 7, 2019), https://bit.ly/39lj0Eg			402, 403, 802
LX0023		ID Card Center, THE U.S. MARINE CORPS, https://bit.ly/3sWIX4B			402, 403, 802
LX0024		All Services, U.S. ARMY FORT BRAGG, https://bit.ly/3oj8sK0			402, 403, 802
LX0025		Physical Security Access Control, U.S. ARMY FORT BRAGG, https://bit.ly/39kE4e0			402, 403, 802
LX0026		Pass & Registration, THE U.S. MARINE CORPS, https://bit.ly/2Yegnxu			402, 403, 802
LX0027		Fort Bragg History, U.S. ARMY FORT BRAGG, https://bit.ly/39mTNJz			402, 403, 802
LX0028		Visitor Information, U.S. ARMY FORT BRAGG, https://bit.ly/39kAcJN			402, 403, 802

Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0029		Common Access Card, U.S. DEP'T OF DEF., https://bit.ly/3iNxtvu			402, 403, 802
LX0030		Enrico Cantoni & Vincent Pons, Strict ID Laws Don't Stop Voters: Evidence from a U.S. Nationwide Panel, 2008-2016, NAT'L BUREAU OF ECON. RSCH. (2019)			402, 403, 802
LX0031		Daniel R. Biggers & Michael J. Hanmer, Understanding the Adoption of Voter Identification Laws in the American States, 45 AM. POL. RSCH. (2017)			402, 403, 802
LX0032		Senate Bill 2: Frequently Asked Questions, COMMONWEALTH OF KY., https://bit.ly/2IQ4tpy			402, 403, 802
LX0033		Photo Voter ID, ALA. SEC'Y OF STATE, http://bit.ly/BamaSOS			402, 403, 802
LX0034		Photo ID Required, MY VOTE WIS., http://bit.ly/WIphotoID			402, 403, 802
LX0035		Georgia Voter Identification Requirements, GA. SEC'Y OF STATE, http://bit.ly/GeorgiaSOS			402, 403, 802
LX0036		Kansas Secure and Fair Elections (SAFE) Act, RILEY CNTY., http://bit.ly/KAelection			402, 403, 802
LX0037		Acceptable Voter IDs, MSVOTERID.MS.GOV, http://bit.ly/MSphotoID			402, 403, 802
LX0038		Voter Identification, VA. DEP'T OF ELECTIONS, https://bit.ly/2ICmCHj			402, 403, 802
LX0039		Elections, ARK. SEC'Y OF STATE, http://bit.ly/ArkReg			402, 403, 802
LX0040		Election Day Voting, FLA. DEP'T OF STATE, http://bit.ly/FLelectiondayvoting			402, 403, 802
LX0041		Voting Identification Requirements, IDAHOVOTES.GOV, http://bit.ly/idahoIDs			402, 403, 802
LX0042		Vote on Election Day, LA. SEC'Y OF STATE, http://bit.ly/LAelectiondayvoting			402, 403, 802
LX0043		Do I need to show identification in order to vote?, MICHIGAN.GOV, http://bit.ly/MichvoterID			402, 403, 802
LX0044		General Voting Information, S.D. SEC'Y OF STATE, http://bit.ly/SDakotaID			402, 403, 802
LX0045		Voter ID, R.I. BD. OF ELECTIONS, http://bit.ly/RhodelslandID			402, 403, 802

		Holmes et al. v. Moore et al., Case No. 18 CVS 15292			
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0046		Photo ID Requirements, S.C. ELECTION COMM'N,			402, 403, 802
LXUU4U		https://www.scvotes.org/node/235			402, 403, 802
LX0047		ID required for Texas Voters, VOTETEXAS.GOV,			402, 403, 802
LX0047		http://bit.ly/TexasVoters			402, 403, 802
LX0048		Photo ID Law, IN.GOV, https://bit.ly/2NV9gIi			402, 403, 802
		Voters Will Be Asked to Show Photo ID Beginning in 2020, N.C. STATE			
LX0049		BD. OF ELECTIONS,			802
		https://bit.ly/385b08s			
LX0050		Voting In This Election, SEC'Y OF STATE OF ARIZ.,			402, 403, 802
LX0030		http://bit.ly/AZelection			402, 403, 602
LX0051		ID Required For Voting, ND.GOV, http://bit.ly/NDvotingID			402, 403, 802
LX0052		Identification Requirements, OHIO SEC'Y OF STATE,			402, 403, 802
LXUUJZ		http://bit.ly/OHlistofIDs			402, 403, 802
LX0053		Voting at the Polling Place Election Day, ALASKA DIV. OF ELECTIONS,			402, 403, 802
LX0033		http://bit.ly/AKelectionday			402, 403, 802
LX0054		RCW 29A.40.160 Voting Centers, WASH. STATE LEG.,			402, 403, 802
LX0034		https://bit.ly/37Z7nks			402, 403, 602
LX0055		Acceptable Forms of Identification, COLO. SEC'Y OF STATE,			402 402 902
LXUUSS		http://bit.ly/COsosIDs			402, 403, 802
LX0056		Voter ID, CT.GOV, http://bit.ly/CTIDfaqs			402, 403, 802
LX0057		Frequently Asked Questions, STATE OF DEL., http://bit.ly/2p7JO69			402, 403, 802
LX0058		Voter ID FAQ, IOWA SEC'Y OF STATE,			402 402 902
LX0036		http://bit.ly/lowaFAQs			402, 403, 802
LX0059		How to Register to Vote, MONT. SEC'Y OF STATE,			402, 403, 802
LXUUS9		http://bit.ly/2ogkGd2			402, 403, 802
LX0060		Facts about Proof of Identity for Voting in Oklahoma, OKLA. STATE			402, 403, 802
LXUUOU		ELECTION BD., http://bit.ly/2mKCpsH			402, 403, 802
LX0061		Voter ID Requirements, VOTE.UTAH.GOV, http://bit.ly/2mEwdIM			402, 403, 802
LX0062		Voters, HAWAII.GOV, https://bit.ly/2luarZS			402, 403, 802
1,0063		Be Registered and Ready, W. VA. SEC'Y OF STATE,			402 402 802
LX0063		https://bit.ly/3oTfMNd			402, 403, 802
1,0064		Do I Need An ID to Vote?, VA. DEP'T OF ELECTIONS,			402 402 902
LX0064		https://bit.ly/3a1uGga			402, 403, 802

		Holmes et al. v. Moore et al., Case No. 18 CVS 15292			
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0065		The Economic Impact of North Carolina's HBCU's, UNCF, https://bit.ly/3qVn5Wk			402, 403, 802
LX0066		Prelim. Expert Report of Allan J. Lichtman, Doc. 73-1, N.C. State Conf. of the NAACP v. Cooper, No. 1:18-cv- 01034 (M.D.N.C. Sept. 17, 2019)			602, 802
LX0067		The changing profile of the U.S. Military: Smaller in size, more diverse, more women in leadership, PEW RSCH. CTR. (Sept. 10, 2019), https://pewrsr.ch/3qlaplw			402, 403, 802
LX0068		Harel Shapira, et al., Trends and Patterns of Concealed Handgun License Applications: A Multistate Analysis, THE S. SOCIO. SOC'Y (Aug. 31, 2017), https://bit.ly/35QDXTH			402, 403, 702, 902
LX0069		Obtaining a Photo ID, IN.GOV, http://bit.ly/INphotoID			402, 403, 802
LX0070		Photo ID, KAN. SEC'Y OF STATE, https://bit.ly/2INECyo			402, 403, 802
LX0071		Voter Photo ID, TN. DEP'T OF SAFETY & HOMELAND SEC., http://bit.ly/TNsafetyIDs			402, 403, 802
LX0072		How to Get a Free State ID Card for Voting, WIS. ELECTIONS COMM'N, http://bit.ly/WIfreeID			402, 403, 802
LX0073		How to Get a Free Photo Voter ID Card, ALA. SEC'Y OF STATE, http://bit.ly/BamafreeID			402, 403, 802
LX0074		Know Your Rights: Voting in Arkansas, ACLU ARKANSAS, http://bit.ly/ACLUark			402, 403, 802
LX0075		Mississippi Voter ID—Easy and Free, MSVOTERID.GOV, https://bit.ly/3a3CTyJ			402, 403, 802
LX0076		Voter ID, GA. DEP'T OF DRIVER SERVS., https://dds.georgia.gov/voter-id			402, 403, 802
LX0077		Application and Affidavit for Voter Verification Card, ARK. SEC'Y OF STATE, (Aug. 28, 2017), https://bit.ly/3oGxsLQ			402, 403, 802
LX0078		How can I get a MS Voter ID card?, MSVOTERID.GOV, https://bit.ly/376Jx6T			402, 403, 802
LX0079		Bring an ID to the polls, VOTE.RI.GOV, https://bit.ly/3oJypTe			402, 403, 802
LX0080		Driver's License Proof of Identity, KAN. DEP'T OF REVENUE, http://bit.ly/KSdriverlicense			402, 403, 802

Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objection
LX0081		Wisconsin ID card for voting purposed—petition process, WIS. DEP'T OF TRANSP., http://bit.ly/WIpetition			402, 403, 802
LX0082		Voter Photo Identification Card Application, VA. DEP'T OF ELECTIONS, https://bit.ly/3cF70PF			402, 403, 802
LX0083		Jane A. Hudiburg, Lame Duck Sessions of Congress Following a Majority-Changing Election: In Brief, 4 CONG. RSCH. SERV., (Nov. 13, 2018), https://bit.ly/2QeSnYy			402, 403, 702, 802
LX0084		Jeffery A. Jenkins & Timothy P. Nokken, Partisanship, the Electoral Connection, and Lame-Duck Sessions of Congress, 1877–2006, 70 J. OF POLS. (2008), https://bit.ly/2WOmDcb			402, 403, 702, 802
LX0085		E. Scott Adler & John Wilkerson, CONGRESSIONAL BILLS PROJECT, http://www.congressionalbills.org/			402, 403, 802
LX0086		RATIONAL CHOICE: READINGS IN SOCIAL AND POLITICAL THEORY (Jon Elster, ed., 1986)			402, 403, 702, 802
LX0087		Gilberto Mendoza, States Offering Driver's Licenses to Immigrants, NAT'L CONF. OF STATE LEGIS. (Nov. 30, 2016), https://bit.ly/1Px1FsY			402, 403, 802
LX0088		Ray Christensen & Thomas J. Schultz, Identifying Election Fraud Using Orphan and Low Propensity Voters, 42 AM. POL. RSCH. 311, 313 (2014), https://bit.ly/2xb49IF			402, 403, 702, 802
LX0089		U.S. GOV'T ACCOUNTABILITY OFFICE, ISSUES RELATED TO STATE VOTER IDENTIFICATION LAWS 63 (2014), https://bit.ly/2spbodT			402, 403, 802
LX0090		Election Fraud Cases from Across the United States, THE HERITAGE FOUND., https://www.heritage.org/voterfraud			402, 403, 802
LX0091		News21 Staff, Election Fraud in America, NEWS21 (Aug. 12, 2012), https://bit.ly/2KWNCzO			402, 403, 802
LX0092		Justin Levitt, A comprehensive investigation of voter impersonation finds 31 credible incidents out of one billion ballots cast, WASH. POST (Aug. 6, 2014), https://wapo.st/2KUoRo5			402, 403, 802

Ex. No.	Date	Holmes et al. v. Moore et al., Case No. 18 CVS 15292 Document Description	BegBates	EndBates	Plaintiffs' Objection
LX0093		Thomas H. McTavish, Audit Report: Performance Audit of the Bureau of Elections, 15–16, MICH. DEP'T OF STATE (May 2012),			402, 403, 802
2.0000		https://bit.ly/2Xld3BH Max Rivlin-Nadler et al., Brazen Voting Fraud Alleged Among Ultra-			
LX0094		Orthodox in Williamsburg, GOTHAMIST (Sept. 11, 2013), https://bit.ly/2loyVnq			402, 403, 802
LX0095		Orli Santo, Brooklyn Hasidim face accusations of voter fraud, TIMES OF ISRAEL (Sept. 13, 2013), https://bit.ly/2RkadHY			402, 403, 802
LX0096		Danielle Furfaro, Defeated council candidate: Poll fraud was rampant in Hasidic W'burg, BROOKLYN PAPER (June 18, 2019), https://bit.ly/2KZTp7U			402, 403, 802
LX0097		Hudson Reporter, Unclear which agency will investigate voter fraud Prosecutor's Office waiting for referral, HUDSON REPORTER ARCHIVE (July 17, 2007), https://bit.ly/2WRfc3U			402, 403, 802
LX0098		Hudson Reporter, Anatomy of voter fraud Will officials follow up on alleged \$10 vote payoff?, HUDSON REPORTER ARCHIVE (July 10, 2007), https://bit.ly/2WQUxSj			402, 403, 802
LX0099		Frank Lynn, Boss Tweed Is Gone, But Not His Vote, N.Y. TIMES (Sept. 9, 1984), https://nyti.ms/2ZpxAm0			402, 403, 802
LX0100		TRAVIS CAMPBELL, DELIVER THE VOTE: A HISTORY OF ELECTION FRAUD, AN AMERICAN POLITICAL TRADITION-1742-2004, 62–63, 114 ff. (2006)			402, 403, 702, 802
LX0101		Peter H. Argersinger, New Perspectives on Election Fraud in the Gilded Age , 100 POL. SCI. Q. 669–87 (Winter, 1985–86)			402, 403, 702, 802
LX0102		Howard W. Allen & Kay Warren Allen, <i>Vote Fraud and Data Validity</i> , in JEROME M. CLUBB, ET AL., ANALYZING ELECTORAL HISTORY A GUIDE TO THE STUDY OF AMERICAN VOTER BEHAVIOR (1981)			402, 403, 702, 802
LX0103		John F. Reynolds, A Symbiotic Relationship: Vote Fraud and Electoral Reform in the Gilded Age, 17 SOC. SCI. HIST. 231 (1993)			402, 403, 702, 802

		Holmes et al. v. Moore et al., Case No. 18 CVS 15292			
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
		Kevin Pallister, Voting Procedures: Inclusion versus Security, in			
LX0104		ELECTION INTEGRITY IN AMERICA:			402, 403, 702, 802
		SECURITY DEMOCRACY 50 (Pippa Norris et al. eds., 2018)			
		M.V. Hood III & William Gillespie, They Just Do Not Vote Like They			
LX0105		Used To: A Methodology to Empirically Assess Election Fraud , 93 SOC.			402, 403, 702, 802
		SCI. Q. 76, 84 (2012)			
		Stephen Ansolabehere, et al., Voter Registration List Quality Pilot		1	
LX0106		Studies: Report on Methodology, (Working Paper, 2010),		1	402, 403, 702, 802
		https://bit.ly/3tkb91u			
		John S. Ahlquist et al., Alien Abduction and Voter Impersonation in the		1	
LX0107		2012 U.S. General Election: Evidence from a Survey List Experiment ,		1	402, 403, 702, 802
		13 ELECTION L. J. 460–75 (May 19, 2014)			
		Frederic C. Schaffer & Tova Andrea Wang, Is Everyone Else Doing It?		1	
LX0108		Indiana's Voter Identification Law in International Perspective , 3		1	402, 403, 702, 802
LXUIUU		HARV. L. & POL'Y REV.		1	402, 403, 702, 802
		397, 407 (2009)			
LV0100		Jack Citrin, Political Trust in a Cynical Age , 21 ANNUAL REV. OF			402 402 702 902
LX0109		POLITICAL SCI. 1094–2939 (2018)		1	402, 403, 702, 802
		Marc Hooghe et al., Where Do Distrusting Voters Turn if There is No			
1.00440		Viable Exit or Voice Option? The Impact of Political Trust on Electoral		1	402 402 702 002
LX0110		Behaviour in the Belgian Regional Elections of June 2009, 46 GOV'T &		1	402, 403, 702, 802
		OPP'N J. 245 (2013) https://bit.ly/2Kn33Sm		1	
		Lonna R. Atkeson & Kyle L. Saunders, The Effect of Election			402, 403, 702, 80
LX0111		Administration on Voter Confidence: A Local Matter? , 40 POL. SCI. &		1	
		POL. 655 (2007)		1	
1.V0112		Ryan L. Claasen et al., Voter Confidence and the Election-Day Voting			402 402 702 002
LX0112		Experience , 35 POL. BEHAV. 215 (2012)			402, 403, 702, 802
		Thad E. Hall et al., The Human Dimension of Elections: How Poll			
LX0113		Workers Shape Public Confidence in Elections , 62 POL. RSCH. Q. 507			402, 403, 702, 802
		(2009)			·
		Stephen Ansolabehere & Nathaniel Persily, Vote Fraud in the Eye of			
LX0114		the Beholder: The Role of Public Opinion in the Challenge to Voter			402, 403, 702, 802
		Identification Requirements , 121 HARV. L. REV. 1737 (2008)			

Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections	
LX0115		Shaun Bowler et al., <i>Election administration and perceptions of fair elections</i> , 38 ELECTORAL STUDIES 1 (2015), https://bit.ly/2ZyWmAl			402, 403, 702, 802	
LX0116		Shaun Bowler & Todd Donovan, A Partisan Model of Electoral Reform: Voter Identification Laws and Confidence in State Elections, 16 STATE POL. & POL'Y Q. 340 (2016), https://bit.ly/2IL2HBO			402, 403, 702, 802	
LX0117		Charles Stewart III et al., Revisiting Public Opinion on Voter Identification and Voter Fraud in an Era of Increasing Partisan Polarization, 68 STAN. L. REV. 1455 (2016), https://bit.ly/2WOyabp			402, 403, 702, 802	
LX0118		LONNA R. ATKESON, VOTER CONFIDENCE IN 2010: LOCAL, STATE, AND NATIONAL FACTORS, IN ELECTION ADMINISTRATION IN THE UNITED STATES: THE STATE OF REFORM AFTER BUSH V. GORE 102–119 (R. Michael Alvarez & Bernard Grofman eds., 2014)			402, 403, 702, 802	
LX0119		Kyle Endres & Costas Panagopoulos, Information and Identification: A Field Experiment on Virginia's Photo Identification Requirements, 3, ESRA 2018 (July 16, 2018), https://bit.ly/39IqIIG (presented at the 2018 Election Sciences, Reform, and Administration Conference held at the University of Wisconsin- Madison in July 2018)			402, 403, 702, 802	
LX0120		Jody L. Herman & Taylor N.T. Brown, <i>The Potential Impact of Voter Identification Law on Transgender Voters in the 2018 General Election</i> , THE WILLIAMS INST., (Aug. 1, 2018)			402, 403, 702, 802	
LX0121		Reasonable Impediment Declaration , TX. SEC'Y OF STATE, https://bit.ly/3801004			402, 403, 802	
LX0122		Indiana Disability Rights: Voting , IN.GOV, https://bit.ly/3aeyoBA			402, 403, 802	
LX0123		Are There Exemptions to the MS Voter ID Requirements?, MSVOTERID.MS.GOV., https://bit.ly/2LrsyUD			402, 403, 802	
LX0124		What ID is required when voting?, TENN. SEC'Y OF STATE, https://bit.ly/373qDhc			402, 403, 802	
LX0125		Rebecca Tippett, Who are North Carolina's Registered Democrats? A 2020 update, CAROLINA DEMOGRAPHY (Aug. 14, 2020), https://bit.ly/3jcgYtc			802	

Holmes et al. v. Moore et al., Case No. 18 CVS 15292					
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections
LX0126		Rebecca Tippett, Who are North Carolina's Registered Republican Voters: 2020 update, CAROLINA DEMOGRAPHY (Aug. 17, 2020), https://bit.ly/3jchfMK			802
LX0127		Deposition Designations from the Deposition Transcript of Joel Ford (June 20, 2019)			802
LX0128		Deposition Designations from the Deposition Transcript of Karen Brinson Bell (Dec. 3, 2020)			802
LX0129		Deposition Designations from the Deposition Transcript of Plaintiff Culp (June 12, 2019)			802
LX0130		Deposition Designations from the Deposition Transcript of Plaintiff Smith (June 12, 2019)			802
LX0131		Deposition Designations from the Deposition Transcript of Plaintiff Peay (Oct. 9, 2019)			802
LX0132		Deposition Designations from the Deposition Transcript of Plaintiff Paul Kearney, Sr. (June 13, 2019)			802
LX0133		Deposition Designations from the Deposition Transcript of Elizabeth Holmes (June 12, 2019)			802
LX0134		Deposition Designation from the Deposition of Kimberly Westbrook Strach dated Jan. 24, 2019			802
LX0135		Tom Minehart, Ex-sheriff is indicted in vote fraud probe, AP (Dec. 3, 1986), http://bit.ly/2YlgxO2			402, 403, 802
LX0136		Three convicted of buying votes , AP (May 16, 2004), https://bit.ly/3pOM9NU			402, 403, 802
LX0137		Bob Shiles, 2 new elections ordered , ROBESONIAN, https://bit.ly/3cC8Elf			402, 403, 802
LX0138		Jon Levine, Confessions of a voter fraud: I was a master at fixing mail- in ballots , NEW YORK POST (Aug. 29, 2020), https://bit.ly/3oEQtOc			402, 403, 802
LX0139		Michael Biesecker & Emery P. Dalesio, <i>AP Exclusive: NC election fraud probed long before 2018 race</i> , AP (Jan. 9, 2019), http://bit.ly/3ttVLjl			402, 403, 802
LX0140		A. Callow, The Tweed Ring 210 (1966)			402, 403, 802

Holmes et al. v. Moore et al., Case No. 18 CVS 15292						
Ex. No.	Date	Document Description	BegBates	EndBates	Plaintiffs' Objections	
LX0141		Borders v. King Cty., No. 05–2–00027–3 (Super. Ct. Chelan Cnty., Wash., June 6, 2005) (verbatim report of unpublished oral decision), 4 Election L.J. 418, 423 (2005).			402, 403, 802	
LX0142		Le & Nicolosi, <i>Dead Voted in Governor's Race,</i> SEATTLE POST-INTELLIGENCER, p. A1 (Jan. 7, 2005), http://bit.ly/2YHST44			402, 403, 802	
LX0143		Justin McCarthy, Four in Five Americans Support Voter ID Laws, Early Voting, GALLUP (Aug. 22, 2016), http://bit.ly/3tD1G5I			402, 403, 802	