

Common Cause, et al., v. Lewis, et al.,
 Wake County Superior Court 18 CVS 014001

Deposition Designation of MORGAN JACKSON
 15-May-19

Deponent Name	Designation				Notes	Objection to Designation	Withdrawn	Counter-Designation				Objection to Counter Designation
	Start Page	Start Line	End Page	End Line				Start Page	Start Line	End Page	End Line	
JACKSON, Morgan	10	20	10	24								
JACKSON, Morgan	10	25	12	13								
JACKSON, Morgan	12	24	13	17								
JACKSON, Morgan	13	18	14	25								
JACKSON, Morgan	15	1	15	10								
JACKSON, Morgan	15	18	15	24								
JACKSON, Morgan	16	13	16	19								
JACKSON, Morgan	17	12	17	18				17	19	17	22	

JACKSON, Morgan	17	23	18	6							
JACKSON, Morgan	18	7	18	21							
JACKSON, Morgan	18	22	19	7							
JACKSON, Morgan	19	8	19	16							
JACKSON, Morgan	19	17	20	13							
JACKSON, Morgan	20	14	21	24							
JACKSON, Morgan	22	4	22	25			21	25	22	3	
JACKSON, Morgan	23	9	23	20							
JACKSON, Morgan	24	2	24	23							
JACKSON, Morgan	24	24	25	19							

JACKSON, Morgan	25	20	26	4								
JACKSON, Morgan	26	5	26	9								
JACKSON, Morgan	26	10	26	15								
JACKSON, Morgan	27	3	27	10								
JACKSON, Morgan	27	17	28	6								
JACKSON, Morgan	28	7	28	16								
JACKSON, Morgan	28	21	29	9								
JACKSON, Morgan	29	10	29	17								
JACKSON, Morgan	29	18	29	23								

JACKSON, Morgan	29	24	30	4							
JACKSON, Morgan	30	5	30	18							
JACKSON, Morgan	30	24	31	2							
JACKSON, Morgan	32	1	32	6							
JACKSON, Morgan	32	7	33	4							
JACKSON, Morgan	33	5	33	18			33	19	33	25	
JACKSON, Morgan	34	10	34	17							

JACKSON, Morgan	34	18	34	25								
JACKSON, Morgan	35	1	35	13								
JACKSON, Morgan	35	14	35	22								
JACKSON, Morgan	36	11	36	16	partial - ends on line 16 at "forward."	Objection - incomplete		36	16	36	22	Hearsay
JACKSON, Morgan	37	7	38	1								
JACKSON, Morgan	38	8	39	2								
JACKSON, Morgan	39	3	40	4								
JACKSON, Morgan	40	5	40	11								
JACKSON, Morgan	46	12	47	14								
JACKSON, Morgan	47	15	48	2								

JACKSON, Morgan	48	3	48	6		Objection - calls for a legal conclusion						
JACKSON, Morgan	48	18	48	22		Objection - calls for a legal conclusion						
JACKSON, Morgan	48	23	48	25								
JACKSON, Morgan	49	3	49	13								
JACKSON, Morgan	49	18	50	13				49	14	49	17	
JACKSON, Morgan	54	2	54	5								
JACKSON, Morgan	54	23	55	4								
JACKSON, Morgan	55	19	56	3								
JACKSON, Morgan	56	4	56	8				56	9	56	11	
JACKSON, Morgan	57	14	58	17				57	1	57	13	
JACKSON, Morgan	60	2	60	9								

JACKSON, Morgan	61	24	62	2							
JACKSON, Morgan	61	18	61	19							
JACKSON, Morgan	62	12	62	14							
JACKSON, Morgan	62	15	63	6							
JACKSON, Morgan	63	7	63	23							
JACKSON, Morgan	64	6	64	15							
JACKSON, Morgan	64	16	66	12							
JACKSON, Morgan	66	23	67	15							
JACKSON, Morgan	68	16	68	23			68	13	68	15	
JACKSON, Morgan	67	16	67	24							

JACKSON, Morgan	68	24	69	5							
JACKSON, Morgan	69	6	69	8							
JACKSON, Morgan	69	12	69	23			69	24	69	25	
JACKSON, Morgan	70	1	71	12							
JACKSON, Morgan	71	13	72	17							
JACKSON, Morgan	72	19	73	21							
JACKSON, Morgan	74	9	74	11							
JACKSON, Morgan	74	12	74	25							
JACKSON, Morgan	75	3	75	8							
JACKSON, Morgan	76	10	76	25							
JACKSON, Morgan	77	1	77	3							

JACKSON, Morgan	77	4	77	6								
JACKSON, Morgan	80	6	80	16								
JACKSON, Morgan	81	13	82	5								
JACKSON, Morgan	82	6	82	15								
JACKSON, Morgan	82	16	83	1								
JACKSON, Morgan	83	2	84	10								
JACKSON, Morgan	84	19	86	11								
JACKSON, Morgan	86	12	87	5								
JACKSON, Morgan	87	6	87	10								

JACKSON, Morgan	87	11	88	2								
JACKSON, Morgan	88	3	88	12								
JACKSON, Morgan	88	13	88	23								
JACKSON, Morgan	88	24	89	15		Objection - incomplete		89	16	89	25	Speculation
JACKSON, Morgan	90	1	90	3								
JACKSON, Morgan	90	4	90	12								
JACKSON, Morgan	90	13	90	18								
JACKSON, Morgan	90	19	92	3								
JACKSON, Morgan	92	6	92	12								
JACKSON, Morgan	92	13	92	21				92	22	93	16	

JACKSON, Morgan	93	17	93	18							
JACKSON, Morgan	93	19	94	1							
JACKSON, Morgan	94	2	94	24							
JACKSON, Morgan	95	9	95	13			95	14	95	15	
JACKSON, Morgan	95	16	96	4							
JACKSON, Morgan	96	5	97	1							
JACKSON, Morgan	97	2	97	12			97	13	97	17	
JACKSON, Morgan	97	18	98	13							
JACKSON, Morgan	98	14	98	23			98	24	99	2	
JACKSON, Morgan	99	3	100	15							
JACKSON, Morgan	100	16	100	23							

JACKSON, Morgan	100	24	101	10								
JACKSON, Morgan	101	11	101	13								
JACKSON, Morgan	101	23	102	1								
JACKSON, Morgan	102	2	102	10								
JACKSON, Morgan	102	13	103	12								
JACKSON, Morgan	103	13	104	19								
JACKSON, Morgan	104	23	105	12								
JACKSON, Morgan	105	13	105	23								
JACKSON, Morgan	105	24	106	15								

JACKSON, Morgan	106	16	109	21							
JACKSON, Morgan	110	6	110	24							
JACKSON, Morgan	112	1	112	11							
JACKSON, Morgan	112	12	113	1	Objection - incomplete		113	2	114	8	Speculation (113:7-17, 113:23- 114:1)
JACKSON, Morgan	111	9	111	25							
JACKSON, Morgan	114	9	115	3			115	4	115	9	
JACKSON, Morgan	115	10	115	22							
JACKSON, Morgan	115	23	116	16							
JACKSON, Morgan	116	17	116	25	partial - ends on line 25 at "win."	Objection - incomplete	116	25	117	4	Speculation, hearsay (116:25- 117:4)
JACKSON, Morgan	117	4	117	5	partial - begins on line 4 at "And"						
JACKSON, Morgan	117	6	117	9	partial - ends on line 9 at "maps."						

JACKSON, Morgan	120	15	120	19								
JACKSON, Morgan	120	20	122	4								
JACKSON, Morgan	122	6	122	17								
JACKSON, Morgan	122	18	123	2								
JACKSON, Morgan	123	20	124	9								
JACKSON, Morgan	124	15	125	8								
JACKSON, Morgan	127	10	128	5								
JACKSON, Morgan	128	6	128	13								
JACKSON, Morgan	130	14	130	19	partial - ends on line 19 at "campaign."	Objection - incomplete		130	19	130	22	Speculation

JACKSON, Morgan	131	19	132	15	partial - ends on line 15 at "terms."	Objection - calls for a legal conclusion; objection - incomplete		132	15	132	19	Speculation
JACKSON, Morgan	132	20	133	6		Objection - mischaracte rizes prior testimony; objection - incomplete		133	7	133	11	Speculation
JACKSON, Morgan	133	12	133	20								
JACKSON, Morgan	133	21	133	24		Objection - calls for a legal conclusion:		133	25	133	25	
JACKSON, Morgan	134	14	135	7								
JACKSON, Morgan	135	8	135	14	partial - ends on line 14 at "him."	Objection - incomplete		135	14	135	17	Speculation
JACKSON, Morgan	135	18	135	20								
JACKSON, Morgan	135	21	136	8								
JACKSON, Morgan	136	16	136	18								

JACKSON, Morgan	136	19	137	5								
JACKSON, Morgan	137	6	137	22								
JACKSON, Morgan	139	24	140	5	partial - ends on line 5 at "No."			140	5	140	6	
JACKSON, Morgan	142	5	142	18	partial - ends on line 18 at "Democratic."	Objection - incomplete		142	18	142	20	Speculation and impermissible lay opinion testimony
JACKSON, Morgan	145	15	146	1				146	2	146	8	
JACKSON, Morgan	146	9	146	12								
JACKSON, Morgan	148	8	148	16								
JACKSON, Morgan	149	12	149	24								
JACKSON, Morgan	150	8	151	1								
JACKSON, Morgan	151	3	151	8								

JACKSON, Morgan	151	9	151	21									
JACKSON, Morgan	151	22	152	1									
JACKSON, Morgan	152	2	152	22									
JACKSON, Morgan	152	23	154	3									
JACKSON, Morgan	154	4	155	12									
JACKSON, Morgan	155	13	155	17									
JACKSON, Morgan	155	18	155	21									
JACKSON, Morgan	155	22	157	8									
JACKSON, Morgan	164	2	164	6	partial - ends on line 6 at "No."	Objection - calls for a legal conclusion; objection - incomplete			164	6	164	9	Speculation and impermissible lay opinion testimony

JACKSON, Morgan	164	20	165	5								
JACKSON, Morgan	170	22	170	25								
JACKSON, Morgan	171	12	171	16	partial - ends on line 16 at "are."	Objection - calls for a legal conclusion; objection - incomplete		171	16	171	23	Impermissible lay opinion testimony
JACKSON, Morgan	171	24	172	11								
JACKSON, Morgan	172	21	173	1								
JACKSON, Morgan	173	24	174	14								
JACKSON, Morgan	175	1	175	4								
JACKSON, Morgan	175	5	175	19								
JACKSON, Morgan	175	20	177	10								

JACKSON, Morgan	177	11	178	21							
JACKSON, Morgan	180	1	180	10							
JACKSON, Morgan	180	11	180	19							
JACKSON, Morgan	180	20	181	7	Objection - calls for speculation; objection - leading as to the question at 180:23- 180:24						
JACKSON, Morgan	181	9	181	11							
JACKSON, Morgan	182	6	182	9			182	1	182	5	