

EXHIBIT 3

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ROUGH DRAFT

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PROCEEDINGS

MARSHALL ANSIN,

17 Alexander; the other is Ford. I don't remember which
18 one is which.

19 Q. But you know one is in the House and one is
20 in the Senate?

21 A. Yes.

22 Q. And Mr. Alexander's first name is Kelly
23 Alexander; is that right?

24 A. I'll take your word for it.

25 Q. Do you know Mr. Ford's first name to be

13

1 Joe?

2 A. I do not know.

3 Q. You just know it's Alexander and Ford?

4 A. Yes.

5 Q. Mr. Ansin, how did you become a plaintiff
6 in this case?

7 A. To the best of my recollection, I got a
8 call from someone in the southern-something social
9 justice league, asking me if I would want to
10 participate.

11 Q. And does the name Souther Coalition for --

12 A. Southern Coalition For Social Justice,
13 yeah.

14 Q. So you hadn't talked with anyone about the
15 lawsuit before someone from the Southern Coalition
16 for social Justice called you?

17 A. Yes.

18 Q. The answer is no, you had not?

19 A. I'm sorry. Repeat the question.

20 Q. sure. That was -- that was not clear.

21 Before you got a call from someone in the
22 Southern Coalition for social Justice about the
23 lawsuit, you hadn't talked with anyone else about it?
24 A. I had not.
25 Q. And do you remember who from the Southern

14

1 Coalition for Social Justice called you about the
2 lawsuit?

3 A. If I remember, her first name was Anita. I
4 do not remember her last name.

5 Q. Does Earls ring a bell?

6 A. It does not.

7 Q. And had you ever signed up to be on the
8 Southern Coalition for social Justice's mailing list
9 or anything like that?

10 A. No.

11 Q. And I'm not going to -- I don't want to ask
12 about conversations that you had with Anita or
13 anybody with the Southern Coalition at this point,
14 but do you know how they would have gotten your name?

15 A. I do not.

16 Q. Okay. And when did you speak with Anita of
17 the Southern Coalition?

18 A. It was last year sometime. I do not
19 remember the date.

20 Q. And before you spoke with the Southern
21 Coalition for Social Justice about this lawsuit, had
22 you ever considered filing a lawsuit related to
23 either the Senate District or the House District in
24 which you reside?

25 A. No.

8 some of them may be underpopulated; is that right?

9 A. That's correct.

10 Q. So would you still want the district lines
11 to stay the same in that case or would you be okay
12 with them being redrawn?

13 A. I think if they were to revert to the way
14 they were before they were redrawn by the legislature
15 and in a more equitable way of the drawing them so as
16 to not to enhance the republican power, that would be
17 a better solution.

18 Q. So it would be your preference for the
19 democrats to be able to gain more power; is that
20 right?

21 A. I think it needs to be fair, not biased
22 towards either party.

23 Q. But you mentioned the republicans,
24 specifically?

25 A. Well, they're the ones who changed the way

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18

1 things are now.

2 Q. And do you believe that gerrymandering ever
3 occurred before republicans drew the lines this time
4 around?

5 A. Like I said, I come from Massachusetts, and
6 my recollection is the first time it happened was in
7 Massachusetts by someone named Gerry, and that was
8 sometime in the 1800s. So to answer your question,
9 yes.

10 Q. But before this lawsuit, you've never
11 brought a lawsuit about redistricting or

12 gerrymandering before, right?

13 A. That is correct.

14 Q. And why did the gerrymandering that you say
15 occurred this time concern you enough to want to
16 become a plaintiff in a lawsuit?

17 A. First of all, I was asked. And secondly,
18 like I said, I believe it to be a form of cheating.
19 So having the opportunity to participate seemed a
20 logical extension of the way I feel.

21 Q. But it's not something you would have done
22 had you not been asked?

23 A. Yes. Asked and answered, I believe.

24 Q. Okay. Fair enough.

25 MR. MCKNIGHT: Mr. Ansin, I want to hand

19

1 you a document now that I'm going to mark as
2 Ansin Exhibit 2. And John, this is just a copy
3 of the complaint you saw a minute ago. I didn't
4 bring an extra copy.

5 MR. O'HALE: I don't need one.

6 MR. MCKNIGHT: I figured you're probably
7 familiar with it by now.

8 (EXHIBIT NO. 2 MARKED FOR IDENTIFICATION.)

9 BY MR. MCKNIGHT:

10 Q. Mr. Ansin, I want to ask you about this
11 document that I've just handed you that is marked as
12 Exhibit 2. Do you recognize this document?

13 A. I do not.

14 Q. Okay. Do you believe you've ever seen it
15 before today?

16 A. I have not.

Page 16

17 Q. Well, I'll represent to you, sir, that this
18 is a copy of the complaint that your attorneys filed
19 on your behalf in this lawsuit. If you'll hang on
20 just a minute, I'll see what other questions I may
21 have.

22 Mr. Ansin, if you'll turn with me to page
23 45 of this document. They're numbered at the bottom.
24 And there's a map at the bottom of page 45. Do you
25 see that?

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1 A. Yes.

2 Q. Do you recognize what that map is?

3 A. Well, it looks like Mecklenburg County.

4 Q. Exactly. And this is actually a map that
5 contains all of the state senate districts that are
6 in Mecklenburg County, and they're in different
7 colors, and they're actually numbered. Your state
8 senate district is district 38, and it's in light
9 green. Do you see that?

10 A. Yes.

11 Q. Does that appear to be an accurate
12 depiction of what your state senate district looks
13 like, to the best of your knowledge?

14 A. To the best of my knowledge, yes.

15 Q. I think you said before you moved, correct,
16 you lived in precinct 128?

17 A. Yes.

18 Q. Do you see that on there? It looks like
19 that's in the top part of the district, kind of near
20 the pink?

3 is interrogatory two.

4 And this question asked you to identify any
5 political party, organization, political committee,
6 candidate campaign committee or related organization
7 that you have worked for, volunteered for or held any
8 position with since January 1st of 2004. Do you see
9 that?

10 A. Yes.

11 Q. And your response to this question is on
12 page 18. And in your response you said that you were
13 the temporary secretary treasurer for precinct 128
14 from April to June of 2015; is that right?

15 A. Yes.

16 Q. And do you currently hold any position
17 with the democratic party at any level?

18 A. I do not.

19 Q. Is that the only position that you've held
20 with the democratic party at any level?

21 A. Ever?

22 Q. Since 2004.

23 A. Yes, that's the only position.

24 Q. You're thinking previously you may have
25 held some type of position with the democratic party

24

1 at some point?

2 A. In Florida.

3 Q. I think you said you attended the
4 Mecklenburg County Convention as a delegate. Do you
5 remember what year that was?

6 A. 2015.

7 Q. And have you had any other political

21 the plaintiffs who are listed here. These are the
22 parties who were involved in the Dickson versus Rucho
23 lawsuit. And will you look through the names of the
24 plaintiffs who are listed at the top and let me know
25 if you recognize any of those names.

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1 A. I do not recognize any of those names.

2 MR. MCKNIGHT: I want to hand you another
3 document that I'm going to mark as Exhibit 6.

4 (EXHIBIT NO. 6 MARKED FOR IDENTIFICATION.)

5 BY MR. MCKNIGHT:

6 Q. This is a cover page of the complaint that
7 was filed in a lawsuit known as North Carolina State
8 Conference or Branches of the NAACP versus State of
9 North Carolina.

10 Will you look at the plaintiffs listed
11 there and let me know if you're familiar with any of
12 those.

13 A. I do not.

14 Q. Does the name Christine Bowser ring a bell
15 to you?

16 A. No.

17 Q. How about David Harris?

18 A. No.

19 Q. In Exhibit 4, turning back to that one,
20 that's the updated discovery responses. Would you
21 look at page 17, please.

22 All right. Page 17 contains interrogatory
23 six, and it just asks you to describe your
24 responsibility, if any, for the payment of any
25 attorneys' fees or costs incurred by your counsel or

1 any attorneys' fees or costs that might be awarded
2 against you in this lawsuit by the Court. It says if
3 you're not responsible for the payment of such fees
4 or costs to identify the person who is.

5 And you answered this question on page 18.

6 And your answer was that you do not have any
7 responsibility for paying attorneys' fees in
8 connection with this litigation; is that correct?

9 A. Yes.

10 Q. And then your next sentence says you do not
11 know who is responsible for paying the attorneys'
12 fees in connection with this lawsuit; is that
13 correct?

14 A. I do not.

15 Q. Is that something that you've ever inquired
16 about?

17 A. No.

18 Q. Do you have any agreement that states --
19 any letter or agreement or contract or anything of
20 that nature that states who is responsible for paying
21 the attorneys' fees that are incurred by your counsel
22 in this litigation?

23 A. No.

24 Q. So you've never received any document to
25 that effect?

1 A. I did not.

2 Q. I believe you said that's not something

3 that you have inquired about; is that right?

4 A. That's correct.

5 Q. Why not?

6 A. The thought just never really crossed my
7 mind.

8 Q. So you don't have any concerns about ever
9 being on the hook for any fees or costs in this
10 lawsuit?

11 A. No.

12 Q. Were you aware that the defendants in this
13 lawsuit had asked you to produce document in your
14 possession that might be related to your claims in
15 this case for the redistributing process?

16 A. Ask that again, please.

17 Q. Were you aware that the defendants in this
18 lawsuit had asked you as a plaintiff to produce any
19 documents that were in your possession that were
20 either related to your claims or allegations in this
21 case or were related to the redistricting process?

22 A. Yes.

23 Q. Did you search for those documents?

24 A. I searched my e-mail for anything regarding
25 redistricting or -- yeah, redistricting.

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1 Q. And is the e-mail address that you
2 searched, is it Marsansin@hotmail.com?

3 A. Yes.

4 Q. Is that the only e-mail address that you
5 have?

6 A. No.

7 Q. Okay.