

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NO. 1:15-CV-00399

SANDRA LITTLE COVINGTON,)

et al.,)

)

Plaintiffs,)

)

vs.)

)

)

THE STATE OF NORTH CAROLINA,)

et al.,)

)

Defendants.)

)

DEPOSITION OF SUSAN SANDLER CAMPBELL

(Taken by Defendants)

Greensboro, North Carolina

Tuesday, February 9, 2016

1 was already asked and answered.

2 BY MR. MCKNIGHT:

3 Q. You can answer.

4 A. Seriously, I have no idea. I have no
5 recollection of any of this. I've tried.

6 Q. But you think during that call they asked
7 you if you lived in the district, right? Is that
8 what you said?

9 A. Yes.

10 Q. And the district you're talking about is
11 Senate District 32?

12 A. Correct.

13 Q. And how long was that conversation?

14 A. I seriously have no idea. I doubt it was
15 all that long.

16 Q. Do you remember whether you agreed in that
17 conversation to join the lawsuit?

18 A. I must have.

19 Q. And do you remember whether there was any
20 discussion about what the goals of the lawsuit were?

21 A. No.

22 Q. And did you have any understanding about
23 what the goals of the lawsuit were when you decided
24 to join them?

25 MR. EPPSTEINER: I'm going to object if

1 that relates to any conversation she had with
2 the attorneys in this case. That's
3 attorney/client privilege information. You can
4 answer to the extent revealing that would not
5 relate to conversations with attorneys.

6 THE WITNESS: I think it was -- I don't
7 think I had any conversation with the person who
8 asked me. The conversation about what the
9 lawsuit was was with the attorney.

10 BY MR. MCKNIGHT:

11 Q. So all you recall is a conversation with
12 the person that you can't remember who asked you if
13 you wanted to join the lawsuit and asked if you lived
14 in Senate District 32; is that right?

15 A. (Witness nods head in agreement.)

16 Q. And then the next thing that happened was
17 you got a call from an attorney; is that correct?

18 A. Yes.

19 Q. Which attorney called you?

20 A. I believe it was John O' Hale.

21 Q. And how far apart were those two
22 conversations? Do you recall?

23 A. I would say a week.

24 Q. Now, did the person who originally
25 contacted you about the lawsuit, did they tell you

1 whether it would cost you anything to become a
2 plaintiff in the lawsuit?

3 A. No.

4 Q. Did you ask about that?

5 A. No.

6 Q. And why not?

7 A. I don't know.

8 Q. And sitting here today, do you know who is
9 responsible for the payment of fees and costs in this
10 lawsuit?

11 A. I do not know.

12 Q. And is that something that you've ever
13 inquired about?

14 A. It is not.

15 Q. Ms. Campbell, do you believe that you have
16 been harmed in any way by the manner in which Senate
17 District 32 was drawn?

18 A. I'm a progressive white voter, and I've
19 seen how the district, it's reached into these
20 communities and pulled black voters into the
21 district. And I think it's limited the influence of
22 the black voters in the district. I've seen the
23 confusion that the split precincts have caused.

24 Q. Now, how has the influence of black voters
25 who live in District 32 been diminished by the way