

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.)

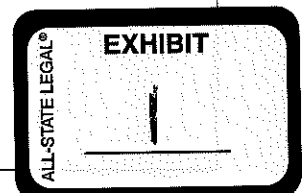
VIDEOTAPED DEPOSITION OF MARGARET DICKSON

2:03 P.M.

FRIDAY, FEBRUARY 19, 2016

POYNER SPRUILL, LLP
301 FAYETTEVILLE STREET
SUITE 1900
RALEIGH, NORTH CAROLINA

By: Tammy Johnson, CVR-CM-M



1 A. No.

2 Q. Okay. Were you responsible for paying any
3 legal fees in the Dickson v. Rucho case?

4 A. No.

5 Q. Did you pay any legal fees?

6 A. No.

7 Q. Did you pay any costs -- did you pay any money
8 to go towards the hard costs of the lawsuit?

9 A. No.

10 Q. All right. Are you aware of who did pay the
11 legal fees for the Dickson v. Rucho lawsuit?

12 A. No.

13 Q. Have you ever talked to anybody about who
14 would be paying the fees in that case?

15 A. No.

16 Q. Okay. Are you familiar with a individual by
17 the name of Scott Falmlen?

18 A. Yes.

19 MR. STRACH: Did I pronounce his
20 name right? Falmlen?

21 MR. SPEAS: Mr. Falmlen.

22 MR. STRACH: Falmlen, okay.

23 A. Yes.

24 Q. Who is Scott Falmlen?

25 A. I couldn't give you his job title. At one

1 it.

2 Q. All right. And -- and why did you ask them if
3 they were interested?

4 A. Because they lived in the district.

5 Q. All right. Did someone ask you to ask those
6 people if they were interested?

7 A. I had a conversation with Mr. Speas about
8 identifying people who lived in the district.

9 Q. Okay. And with respect to the Covington
10 lawsuit, did Mr. Speas tell you who would be
11 funding the Covington lawsuit?

12 A. No.

13 Q. One of the individuals you talked to was David
14 Mann; is that correct?

15 A. Yes.

16 Q. All right. And I'm going to mark these. I've
17 got some exhibits, one exhibit, actually, that
18 I'm going to label Defendant's Exhibit Number
19 1 that I'm going to hand to you and give Eddie
20 a copy.

21 (WHEREUPON, Defendant's Exhibit 1 was
22 marked for identification.)

23 Q. Ms. Dickson, these are documents -- these are
24 documents that Mr. Speas e-mailed to me
25 yesterday. Do they look familiar? And take