

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 CRYSTAL JOHNSON
(Taken by Defendants)
FEBRUARY 16, 2016

Reported by: Faith Pitino, Court Reporter
Notary Public



1 A. As far as the redistricting, and that was it. I
2 just can't -- like I said, I really can't remember it all.
3 I really can't remember any of it, to be honest with you.
4 It's just --

5 Q. All right. But you said that you discovered an
6 issue with redistricting that needed to be resolved.

7 A. And that was --

8 MS. MACKIE: Objection. She just testified that
9 she can't remember anything more than that. I mean, I'll
10 let her answer this question, but then I think we should
11 move on.

12 BY MR. MCKNIGHT:

13 Q. But you can't remember what specifically that
14 issue was; is that right?

15 A. And I'll say it again, being a mother of, now four
16 in my home, I have to answer questions daily about fourth
17 grade math, that I don't remember doing in the fourth grade,
18 so please -- and I'm pregnant, again, so there's a lot -- I
19 could tell you -- I have a -- my 17-year-old gets chemo
20 every week, so I'm really dealing with a lot. I don't
21 remember everything I do from day to day.

22 Q. And I completely understand that. I'm just trying
23 to make sure that I understand, today, everything that you
24 may know about the lawsuit, so that's why I'm asking. So if
25 you can't remember anything that I ask, that's fine. I'm

1 not -- it's not a memory test or anything like that.

2 A. I'm sure when I leave, my husband's going to ask
3 me what questions did they ask, and I'm going to say, "I
4 don't remember."

5 Q. Okay. I understand that you're involved with the
6 group called "The Coalition Against Racism" in Pitt County;
7 is that right?

8 A. Yes.

9 Q. And what does that group do?

10 A. Pretty much, they fight for people who are being
11 targeted with racial issues on the job, at schools. We
12 rally for -- we rally for unjust firing at -- you know,
13 depending on what the situation is. We -- they help out
14 with children who are being targeted in schools, that may
15 have disabilities. Things like that.

16 Q. And is that group associated with the NAACP?

17 A. I do believe so.

18 Q. Okay. What was that?

19 A. I do believe so.

20 Q. Okay. And how? In what way?

21 A. When we have meetings, there will be members of
22 the NAACP who attend the meetings.

23 Q. And how long have you been involved with that
24 group?

25 A. Four years. A little over four years.

1 Q. All right. Ms. Johnson, I don't think I have any
2 further questions for you, at this time.

3 MS. MACKIE: I have just one or two questions.

4 EXAMINATION

5 BY MS. MACKIE:

6 Q. I believe you testified that you had a lot going
7 on in -- over the past year; is that correct?

8 A. Yes.

9 Q. Okay. If this lawsuit was filed back in May of
10 2015, can you just tell me what was going on in your life,
11 around that time?

12 A. Okay. Well, just before May, I lost my dad in
13 March. We buried him in April. May -- I was the verge of
14 finishing up my clinicals, for my medical assistant degree.
15 May 4th, my son -- my older son, was diagnosed with
16 leukemia, acute lymphoblastic leukemia, which his symptoms
17 started around April. I was fighting the hospital to run a
18 CBC for him, since April, and they wouldn't do it until
19 May 4, and finally it was determined that he had leukemia.
20 He was in the hospital for almost a month, going through
21 tests and chemo, and I was almost with him every day. It
22 was so devastating. I was trying to hold onto everything
23 and finish my clinicals, graduate, which I did, and just
24 trying to keep my son's faith up, trying to keep my faith
25 up. So that's -- and that's what we've been dealing with