

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

No. 1:15-CV-00399

SANDRA LITTLE COVINGTON, )  
et al., )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
THE STATE OF NORTH CAROLINA, )  
et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

DEPOSITION OF JUANITA ROGERS

Volume I

\_\_\_\_\_

10:01 A.M

THURSDAY, FEBRUARY 11, 2016

\_\_\_\_\_

OGLETREE, DEAKINS, NASH, SMOAK & STEWART  
4208 SIX FORKS ROAD, SUITE 1100  
RALEIGH, NORTH CAROLINA 27609

By: Sophie Brock, RPR, CRR



1 A. Okay.

2 Q. -- but I appreciate it.

3 And do you know Mr. Baskerville personally?

4 A. Well, I would say that Nathan attended the  
5 school where I used to work at when he was young.

6 Q. Okay. Which school was that?

7 A. Eaton-Johnson Middle School, in Henderson,  
8 North Carolina.

9 Q. Okay. What did you do at Eaton-Johnson?

10 A. I was a librarian.

11 Q. So when he was a student in middle school?

12 A. Uh-huh.

13 Q. That's fun. How long did you work at the  
14 school?

15 A. I worked there 13 years before retirement.

16 Q. Okay. Well, interesting.

17 So moving on to the State Senate  
18 District 20, do you know who represents that district?

19 A. Floyd McKissick.

20 Q. And how long do you think -- do you know how  
21 long he has represented that district?

22 A. All I can say, a very long time.

23 Q. Fair enough.

24 A. I can't recall the number of years.

25 Q. And do you know Mr. McKissick personally?

1 contact with Ms. Earls?

2 A. I got in contact with Ms. Earls.

3 Q. Okay. If Theo hadn't called you, do you  
4 think you would have participated in this lawsuit in  
5 any way?

6 A. If I had been asked, yeah.

7 Q. Okay. If no one had asked you, do you think  
8 you would have taken it upon yourself to sue the State  
9 of North Carolina?

10 A. Probably eventually.

11 Q. Okay. Did Theo -- I think you mentioned a  
12 little bit what Theo told you about the lawsuit. Did  
13 he explain to you what the lawsuit was kind of seeking  
14 to accomplish?

15 A. No, he didn't.

16 Q. So he didn't talk about the -- what the  
17 plaintiffs wanted or what the end result was going to  
18 be?

19 A. No.

20 Q. Okay. Did you talk to anyone -- before you  
21 spoke with Ms. Earls, did you talk with anyone other  
22 than Theo and the two attorneys down in Oxford?

23 A. No.

24 Q. Okay.

25 A. Because, actually, I -- you know, I didn't

1 Q. Philip A. Baddour?

2 A. No.

3 Q. Douglas A. Wilson?

4 A. No.

5 Q. Okay. I apologize. I know that was painful.

6 One more. Sorry.

7 (Exhibit No. 5 was marked for identification.)

8 Q. Ms. Rogers, do you recognize this document?

9 A. No. I have not had this document.

10 Q. I'll represent to you that this is the first  
11 page of a Complaint filed titled "North Carolina State  
12 Conference of Branches of the NAACP v. State of  
13 North Carolina." It's another redistricting lawsuit  
14 that was filed a couple of years ago.

15 I'm just going to go through and see if you  
16 know or have had conversations with any of the  
17 following people; all right?

18 A. Okay.

19 Q. Reva McNair?

20 A. No.

21 Q. Matthew Davis?

22 A. No.

23 Q. Tressie Stanton?

24 A. No.

25 Q. Anne Wilson?

1 A. No.

2 Q. Sharon Hightower?

3 A. No.

4 Q. Kay Brandon?

5 A. No.

6 Q. Goldie Wells?

7 A. No.

8 Q. Gray Newman?

9 A. No.

10 Q. Yvonne Stafford?

11 A. No.

12 Q. Robert Dawkins?

13 A. No.

14 Q. Sara Stohler?

15 A. No.

16 Q. Hugh Stohler?

17 A. No.

18 Q. Octavia Rainey?

19 A. No.

20 Q. Charles Hodge?

21 A. No.

22 Q. Marshall Hardy?

23 A. No.

24 Q. Martha Gardenhight?

25 A. No.

1 Q. Ben Taylor?  
2 A. No.  
3 Q. Keith Rivers?  
4 A. No.  
5 Q. Romallus O. Murphy?  
6 A. No.  
7 Q. Carl White?  
8 A. No.  
9 Q. Rosa Brodie?  
10 A. No.  
11 Q. Herman Lewis?  
12 A. No.  
13 Q. Clarence Albert?  
14 A. No.  
15 Q. Evester Bailey?  
16 A. No.  
17 Q. Albert Brown?  
18 A. No.  
19 Q. Benjamin Lanier?  
20 A. No.  
21 Q. Gilbert Vaughn?  
22 A. No.  
23 Q. Avie Lester?  
24 A. No.  
25 Q. Theodore Muchiteni?

1 A. No.

2 Q. William Hobbs?

3 A. No.

4 Q. Jimmy Ray Hawkins?

5 A. No.

6 Q. Horace P. Bullock?

7 A. No.

8 Q. Roberta Waddle?

9 A. No.

10 Q. Christina Davis-McCoy?

11 A. No.

12 Q. James Oliver Williams?

13 A. No.

14 Q. Margaret Speed?

15 A. No.

16 Q. Larry Laverne Brooks?

17 A. No.

18 Q. Carolyn S. Allen?

19 A. No.

20 Q. Walter Rogers, Sr.?

21 A. No.

22 Q. Sean Meachem?

23 A. No.

24 Q. Mary Green Bonaparte?

25 A. No.

1 Q. Samuel Love?

2 A. No.

3 Q. Courtney Patterson?

4 A. No.

5 Q. Willie O. Sinclair?

6 A. No.

7 Q. Cardes Henry Brown, Jr.?

8 A. No.

9 Q. Jane Stephens?

10 A. No.

11 Q. Okay.

12 Ms. Rogers, are you paying your attorneys to  
13 take part in this lawsuit?

14 A. No, I'm not.

15 Q. Have you ever had any discussions about how  
16 this lawsuit is being funded?

17 A. I did initially, and I think I was told  
18 through the Southern Coalition.

19 MS. MACKIE: I'm going to stop you right  
20 there. If you're going to be talking about  
21 conversations that you had with Anita, those  
22 conversations are privileged.

23 THE WITNESS: Okay.

24 Q. So any conversations with any non- --

25 A. No.



1 Q. -- Southern Coalition --

2 A. No.

3 Q. -- or Ms. Mackie?

4 A. No.

5 Q. Okay.

6 Do you know any of the other plaintiffs in  
7 this case?

8 A. I certainly do not.

9 Q. Okay. So did it ever concern you that you  
10 might have to pay some legal fees for this case?

11 A. Not really, because I don't have no money to  
12 pay legal fees.

13 Q. Okay. Is there any written document  
14 explaining how you're not responsible for legal fees?  
15 Does that document exist?

16 A. Not that I know of.

17 Q. Okay.

18 A. I mean, I haven't seen anything, I don't  
19 think.

20 Q. Okay.

21 Please turn to -- I think this is what we  
22 were looking at at Rogers 3, Interrogatories.

23 A. Okay.

24 Q. Turn to page 37. No. 7 asks for you to  
25 describe any involvement in the 2011 redistricting