

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., )

Defendant. )

\_\_\_\_\_ )

DEPOSITION OF VIOLA FIGUEROA

Volume I

\_\_\_\_\_

3:42 P.M.

FRIDAY, FEBRUARY 5, 2016

\_\_\_\_\_

OGLETREE, DEAKINS, NASH, SMOAK & STEWART

4208 SIX FORKS ROAD, SUITE 1100

RALEIGH, NORTH CAROLINA 27609

By: Sophie Brock, RPR, CRR



1 A. No.

2 Q. Sidney Dunston?

3 A. No.

4 Q. Alma Adams?

5 A. Now, I talked to her three times.

6 Q. Okay. Have any of the conversations you've  
7 ever had with her been about any of the redistricting  
8 cases?

9 A. No.

10 Q. Okay.

11 Steve Bowden?

12 A. No.

13 Q. Jason Coley?

14 A. No.

15 Q. Karl Bertrand Fields?

16 A. No.

17 Q. Pamlyn Stubbs?

18 A. No.

19 Q. Don Vaughan?

20 A. No.

21 Q. Bob Etheridge?

22 A. No.

23 Q. George Graham?

24 A. No.

25 Q. Thomas Chumley?

1 A. No.

2 Q. Aisha Dew?

3 A. No.

4 Q. Geneal Gregory?

5 A. No.

6 Q. Vilma Leake?

7 A. No.

8 Q. Rodney Moore?

9 A. I've talked to him.

10 Q. Talked to him. In what context have you  
11 talked with him?

12 A. The same with Ms. Adamson. Seen him at the  
13 Democratic functions.

14 Q. Okay. Have any of the conversations you've  
15 had with him been about redistricting?

16 A. No.

17 Q. All right.

18 Brenda Martin Stevenson?

19 A. No.

20 Q. Jane Whitley?

21 A. No.

22 Q. Tim Valentine?

23 A. No.

24 Q. Lois Watkins?

25 A. No.

1 Q. Richard Joyner?

2 A. No.

3 Q. Melvin McLawhorn?

4 A. No.

5 Q. Randall Jones?

6 A. No.

7 Q. Bobby Charles Townsend?

8 A. No.

9 Q. Albert Kirby?

10 A. No.

11 Q. Terrence Williams?

12 A. No.

13 Q. Norman Camp?

14 A. No.

15 Q. Mary Poole?

16 A. No.

17 Q. Stephen Smith?

18 A. No.

19 Q. Philip Baddour?

20 A. I know an attorney Phil Baddour, but I don't  
21 know if this is the same person.

22 Q. You know Phil Baddour who's an attorney in  
23 Goldsboro?

24 A. Yes.

25 Q. All right. How do you know him?

1 A. At chamber functions --

2 Q. So --

3 A. -- at his office functions.

4 Q. So have you ever had any conversations with  
5 him about redistricting?

6 A. No.

7 Q. All right.

8 And then the last one here is Douglas Wilson  
9 at the very end?

10 A. Yes.

11 Q. And this is the Douglas Wilson we've talked  
12 about before; correct?

13 A. I guess it is. I don't know.

14 Q. Yeah, I should -- that is the same name?

15 A. That is the same name of a gentleman I know  
16 that talked to me about the redistricting lawsuit.

17 Q. All right. Thank you.

18 I've got one more. I'm sorry that was  
19 tedious, and this will be too, but I just, again, want  
20 to make sure we touch on everything.

21 This is going to be Exhibit 7.

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

23 Q. And, Ms. Figueroa, I'm going to represent to  
24 you that this is a similar first page from an amended  
25 complaint of another lawsuit filed in 2011 that