

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

NO. 1:15-CV-00399

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SANDRA LITTLE COVINGTON, et al.,

Plaintiffs,

vs.

THE STATE OF NORTH CAROLINA,

et al.,

Defendants.

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DEPOSITION OF  
BRYAN PERLMUTTER

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3:00 P.M.

THURSDAY, FEBRUARY 11, 2016

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OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

4208 SIX FORKS ROAD, SUITE 1100

RALEIGH, NORTH CAROLINA

By: Maren M. Fawcett, RPR, CRR



1 A. Okay.

2 Q. Reva McNair?

3 A. No.

4 Q. Matthew Davis?

5 A. No.

6 Q. Tressie Stanton?

7 A. No.

8 Q. Anne Wilson?

9 A. No.

10 Q. Sharon Hightower?

11 A. No.

12 Q. Kay Brandon?

13 A. No.

14 Q. Goldie Wells?

15 A. No.

16 Q. Gray Newman?

17 A. No.

18 Q. Yvonne Stafford?

19 A. No.

20 Q. Robert Dawkins?

21 A. Yes.

22 Q. Okay. Sara Stohler?

23 A. No.

24 Q. Hugh Stohler?

25 A. No.

1 Q. Octavia Rainey?

2 A. No.

3 Q. Charles Hodge?

4 A. No.

5 Q. Marshall Hardy?

6 A. No.

7 Q. Martha Gardenhight?

8 A. No.

9 Q. Ben Taylor?

10 A. No.

11 Q. Keith Rivers?

12 A. Yes.

13 Q. Romallus Murphy?

14 A. No.

15 Q. Carl White?

16 A. No.

17 Q. Rosa Brodie?

18 A. No.

19 Q. Herman Lewis?

20 A. No.

21 Q. Clarence Albert.

22 A. No.

23 Q. Evester Bailey?

24 A. No.

25 Q. Albert Brown?

1 A. No.

2 Q. Benjamin Lanier?

3 A. No.

4 Q. Gilbert Vaughn?

5 A. No.

6 Q. Avie Lester.

7 A. No.

8 Q. Theodore Muchiteni?

9 A. No.

10 Q. William Hobbs?

11 A. No.

12 Q. Jimmie Ray Hawkins?

13 A. No.

14 Q. Horace P. Bullock?

15 A. No.

16 Q. Roberta Waddle?

17 A. No.

18 Q. Christina Davis-McCoy?

19 A. No.

20 Q. James Oliver Williams?

21 A. No.

22 Q. Margaret Speed?

23 A. No.

24 Q. Larry Laverne Brooks?

25 A. No.

1 Q. Carolyn Allen?

2 A. No.

3 Q. Walter Rogers, Sr.?

4 A. No.

5 Q. Shawn Meachem?

6 A. No.

7 Q. Mary Green Bonaparte?

8 A. No.

9 Q. Samuel Love?

10 A. No.

11 Q. Courtney Patterson?

12 A. No.

13 Q. Willie Sinclair?

14 A. No.

15 Q. Cardes Henry Brown, Jr.?

16 A. No.

17 Q. Jane Stevens?

18 A. No.

19 Q. Okay. You said you know Robert Dawkins?

20 A. Yes.

21 Q. Explain to me your relationship with  
22 Mr. Dawkins.

23 A. We have a professional relationship in the  
24 context of providing education, civic education-type  
25 material to people.

1 Q. How did you meet Mr. Dawkins?

2 A. The Southern Vision Alliance is a statewide --  
3 or we mainly work in North Carolina and across the state  
4 and so part of my job is to meet with folks in different  
5 parts of the state where we have -- we're supporting  
6 young people to understand different things that people  
7 are working on.

8 Q. Okay. So what does Mr. Dawkins do for a  
9 living?

10 A. I believe at the time he was working for  
11 Democracy North Carolina.

12 Q. Okay.

13 A. And -- yeah.

14 Q. So Southern Vision Alliance, is that --

15 A. Yes.

16 Q. Southern Vision Alliance, they work with  
17 Democracy North Carolina?

18 MS. RIGGS: Object to form, but you can  
19 answer.

20 A. Yes. The Southern Vision Alliance has --  
21 legally has different projects. Some of those projects  
22 have lots of different partners. So one of the projects  
23 that I mainly work with sometimes works with Democracy  
24 North Carolina.

25 Q. Okay. So the Southern Vision Alliance does

1 just different projects, there's not one overarching  
2 thing everyone's always working on all the time; is that  
3 fair to say?

4 A. Yeah, I mean, so, you know.

5 Q. I'm just trying to understand the job. This  
6 is the first I've heard of it. So have you discussed  
7 redistricting with Mr. Dawkins?

8 A. I have not.

9 Q. Okay. I believe you said you know Keith  
10 Rivers?

11 A. Yes.

12 Q. Tell me about Keith Rivers.

13 A. What would you like to know?

14 Q. How did you meet Keith Rivers?

15 A. Again, we were supporting students in our  
16 leadership development program that go to Elizabeth  
17 State University and we got connected as someone that he  
18 might be able to help us with some of the work that we  
19 were doing there.

20 Q. Okay. Does he -- is he affiliated with  
21 Democracy NC, too?

22 A. I don't know.

23 Q. Or was he when you dealt with him?

24 A. Not that I know of.

25 Q. Okay. I believe I forgot to ask this. Do you

1 remember the time frame that you worked with  
2 Mr. Dawkins?

3 A. Probably 2013-ish.

4 Q. And what about -- what about with Mr. Rivers?

5 A. About the same time, 2013.

6 Q. And do you remember if Mr. Rivers was  
7 connected with any sort of organization?

8 A. At the time I -- from my recollection, I met  
9 with him, he was working with the local NAACP chapter in  
10 that area.

11 Q. And when is the last time you spoke with  
12 Mr. Rivers?

13 A. Probably about a year ago, if not more. We  
14 don't have a very regular relationship.

15 Q. Have you ever spoken with him about  
16 redistricting?

17 A. I have not.

18 Q. Okay. And I can't remember if I asked you  
19 this, have you spoken with Mr. Dawkins about  
20 redistricting?

21 A. You asked me that.

22 Q. I'm sorry, refresh your answer.

23 A. No.

24 Q. Okay. Thank you. Bryan, are you responsible  
25 for paying your own attorneys' fees?