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 SENATOR ROBERT RUCHO

10:01 A.M.
MONDAY, FEBRUARY 8, 2016

POYNER SPRUILL

301 FAYETTEVILLE STREET

SUITE 1900

RALEIGH, NORTH CAROLINA

By: Denise Myers Byrd, CSR 8340, RPR

Exhibit 11

1 district from being 42.5 to 39 percent 2 black contradicts the claim that the 3 proposed 32nd District is made for the 4 purpose of being a majority-minority 5 district. 6 "Redistricting Senator Linda Garrou 7 out of this district appears to be a 8 solely partisan based decision. Please 9 refer to Senator Linda Garrou in your 10 plan as 'Incumbent Senator Linda Garrou' 11 instead of the radically [sic] charged 12 'current white incumbent.' 13 "Most importantly, please keep 14 Senator Linda Garrou in the district she 15 currently represents." 16 0. Did that statement come to you from somebody in 17 an e-mail? 18 I don't even remember the statement. I don't 19 remember the statement. 20 Q. You don't remember it? 21 A. No. I mean, there was --22 Q. Did your e-mail indicate who sent you that 23 statement? 24 A. I don't remember the e-mail. 25 Q. Okay. 34 1

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- A. So I'm not sure I can help with that answer.
- Q. And after you received this e-mail, did you in fact increase the black voting age population in Senate District 32?
- A. My best recollection on Senate District 32, which was a pod or grouping between Yadkin and Forsyth County, was -- and we were committed to that two-county -- that two-county pod of Yadkin and Forsyth. It -- we could never achieve a majority-minority district in that area complying with Stephenson criteria, which is what we were doing.

I'm not sure who would send that.

- Q. Okay. Did you increase the black voting age population in that district from 39 percent to 42 percent?
- A. I can't remember.
- Q. Would the record reflect whether that happened or not?
- 20 A. I don't know.
- Q. Do you recall whether or not Senator Garrou was in or outside Senate District 32?
- A. You mean subsequently or --
- Q. At any point.
 - A. Well, I think in the end she was in

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