

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
NO. 1:13-CV-00949

DAVID HARRIS; CHRISTINE
BOWSER; and SAMUEL LOVE,

Plaintiffs,

v.

PATRICK MCCRORY, in his capacity
as Governor of North Carolina;
NORTH CAROLINA STATE BOARD
OF ELECTIONS; and JOSHUA
HOWARD, in his capacity as Chairman
of the North Carolina State Board of
Elections,

Defendants.

DECLARATION OF ALEXANDER McCLURE PETERS

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am over 18 years of age, legally competent to give this declaration and have personal knowledge of the facts set forth in it.
2. I am a Senior Deputy Attorney General in the North Carolina Department of Justice. In that capacity, I both engage in litigation on behalf of the State of North Carolina and its officers and officials, and oversee the Special Litigation division of the Attorney General's Office.
3. I graduated from the University of North Carolina School of Law in May, 1986, and was licensed to practice law in North Carolina in August, 1986. I joined the staff of the North Carolina Attorney General's Office on May 1, 1989, and have been with the Attorney General's Office from that until the present. For the last 20 years or so, a significant portion of my work in the Attorney General's Office has involved election-related litigation, including redistricting, campaign finance, ballot access, voting rights, and other issues related to conducting elections.

4. Because the Attorney General's Office does not bill clients for election-related litigation, I do not keep case-specific records or time sheets regarding such litigation. As a result, any statement on my part of the time spent on a specific elections-related case would necessarily be an estimate, based on an examination of court dates, depositions and meetings of counsel I attended, briefs and memoranda I participated in writing, and similar factors.

5. Based on factors such as these, it is my good faith, best estimate that I worked approximately 125–140 hours on this case from the time it was filed through trial and post-trial submission, until judgment was issued on February 5, 2016.

6. I declare under penalty of perjury that the foregoing is, to the best of my knowledge, true and correct.

Executed this 22nd day of June, 2016

/s/ Alexander McC. Peters
Alexander McC. Peters