

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

COMMON CAUSE,)
)
Plaintiffs,)
) Civil Action No.
v.) 1:16-CV-1026-WO-JEP
ROBERT A. RUCHO, in his official)
capacity as Chairman of the North)
Carolina Senate Redistricting)
Committee for the 2016 Extra)
Session and Co-Chairman of the)
Joint Select Committee on)
Congressional Redistricting,)
et al.,)
)
Defendants.)

League of Women Voters of North)
Carolina, et al,)
)
Plaintiffs,)
) Civil Action No.
v.) 1:16-CV-1164-WO-JEP
ROBERT A. RUCHO, in his official)
capacity as Chairman of the North)
Carolina Senate Redistricting)
Committee for the 2016 Extra)
Session and Co-Chairman of the)
Joint Select Committee on)
Congressional Redistricting,)
et al.,)
)
Defendants.)

DEPOSITION UPON ORAL EXAMINATION
OF WILLIS WILLIAMS
TAKEN ON BEHALF OF THE DEFENDANTS
WILLIAMSTON, NORTH CAROLINA
March 30, 2017

1 A. No.

2 Q. Did you review any documents before you
3 came?

4 A. No.

5 Q. Okay. Did you bring anything with you
6 here today, any documents?

7 A. No.

8 Q. Mr. Williams, are you married?

9 A. Yes.

10 Q. How long have you been married?

11 A. 52 years.

12 Q. I just got married this October. That's
13 great. Congratulations.

14 What's your wife's name?

15 A. Delsie. D-e-l-s-i-e.

16 Q. Delsie. That's a nice name. I like
17 that.

18 And where do you and Delsie live?

19 A. In Jamesville, 1250 New Street.

20 Q. How long have you lived at that address?

21 A. At least 40, 50 years.

22 Q. Okay. That's long enough for purposes of
23 our conversation.

24 Okay. And what does Delsie do for a
25 living or what did she do --

1 Q. Did you go to college or --

2 A. '63. '59 to '63 at A&T.

3 Q. Go Aggies.

4 A. Yep. Degree in chemistry.

5 Q. Smarter than I am. I could never do
6 that, chemistry.

7 And what did you do when you got out of
8 school?

9 A. Unfortunately, Uncle Sam says come to
10 Vietnam.

11 Q. And how long were you in the military?

12 A. From '63 to '66.

13 Q. What did you do when you got out?

14 A. Unfortunately, what I'm doing now. I'm a
15 disabled vet. I got injured. The --

16 Q. Thank you for your service.

17 A. Thank you.

18 Q. Now, I'm looking at the discovery
19 responses that you produced through your attorney. I
20 noticed that you have had quite a bit of civic
21 involvement, so if you don't mind, I'm just going to
22 ask you some questions about the different
23 organizations you listed.

24 A. Okay.

25 Q. First, you said that you had -- that you

1 were the Jamesville Democratic precinct chair from 2008
2 I guess to the present; is that correct?

3 A. That is correct.

4 Q. What do you do in your role as the chair
5 of the precinct?

6 A. Basically, call meetings and try to turn
7 Republicans into Democrats.

8 Q. That's not simple.
9 So is that something -- is that something
10 that you're elected to or did somebody --

11 A. Something I'm elected to. We would have
12 a meeting each year to have elections.

13 Q. Okay. And then it says that you were --
14 that you're a live member of the Martin County NAACP
15 branch?

16 A. That is correct.

17 Q. Have you held any leadership positions in
18 that organization?

19 A. I'm basically just as a political chair.

20 Q. And as the political chair for that
21 organization, what do you do?

22 A. Basically, again, try and make
23 Republicans Democrats.

24 Q. Are you involved in Get Out The Vote
25 drive --

1 A. Yes, I'm involved.

2 Q. So do you canvass neighborhoods?

3 A. Yes, I do.

4 Q. Hand out flyers?

5 A. Yes.

6 Q. And again --

7 A. I get other people to do it. I don't --

8 Q. Right.

9 A. -- being disabled, I'm kind of at a
10 disadvantage, but I -- that's part of what I do.

11 Q. And you're promoting strictly Democratic
12 candidates?

13 A. I do.

14 Q. Can you tell me some of the recent
15 candidates you guys supported?

16 A. All Democrats.

17 MS. RIGGS: Objection to form. Can you
18 just -- "you guys."

19 MR. ERWIN: I'm sorry.

20 BY MR. ERWIN:

21 Q. That you in the role as the political
22 chair for the local branch of the NAACP, who were some
23 of the candidates that you worked for recently?

24 A. Not as NAA -- we do education. We get,
25 we tell the people what are the records of people, and

1 had a progressive Republican and a more conservative
2 Democrat, would you vote for the more conservative
3 Democrat because they were labeled Democrat or would
4 you vote for the more progressive Republican?

5 A. To be honest, I would vote for the
6 conservative Democrat, because at least again, it
7 changes that ratio that we're talk -- you know, it
8 changes that ratio, because when you look at the way
9 things are apportioned, apportionment, is that the
10 seats are given -- chairmanships, all of those things
11 are given to the numbers rather than to people's
12 ideals.

13 Q. So is it your opinion and your -- or your
14 belief that the problem with the plan is that statewide
15 it disadvantages Democrats?

16 A. That's correct.

17 Q. Okay. And you mentioned earlier that you
18 get 3 seats instead of 13 seats; is that correct?

19 A. Did I --

20 Q. That's what you stated. I mean, we were
21 just talking, but if you said instead of 13 seats, we
22 get 3 seats. But was it your opinion that Democrats
23 should be entitled to all the congressional --

24 A. No. No. If I said that, I did not mean
25 that.

1 we could always win, but in general, the experts found
2 that only less than one percent of whites would cross
3 over and vote for blacks, so therefore, black would
4 never win.

5 Q. Was it challenged in multi-member
6 districts or single --

7 A. Well, it was both. It was -- I mean,
8 well, it was -- well, it was only challenging for --
9 but the settlement was -- had to do it both ways
10 because the interesting thing about Martin County is
11 Martin County was divided exactly half for -- on the
12 one vote for the east. People east felt for the
13 unions. People west felt for the confederacy, and
14 they're fighting. But anyway, that was the case, so
15 that is the case, so it was -- the case was the -- it
16 was, you know, in favor of the plaintiffs because --

17 Q. Right.

18 A. -- it was proven that people were doing
19 exactly that, they would always vote for --

20 Q. Right. Along the racial line?

21 A. Along the racial line. Yes, it was
22 strictly along racial lines.

23 Q. Okay. Now, you currently live in
24 congressional district 1; is that correct?

25 A. Correct.

1 So in those elections, the candidate that
2 you voted for, your candidate of choice, did they
3 always prevail?

4 A. They did.

5 Q. Okay. And you're probably aware just
6 because you like history and you have been involved in
7 this a while, are you aware that the congressional
8 district 1 has been represented by a Democrat
9 continuously since 1893?

10 A. Yes.

11 Q. But in your discovery responses, you do
12 say that you feel again like your vote as a Democrat
13 has been diluted. Can you explain that to me.

14 A. Again, because of the state.

15 Q. Okay. So statewide, it's been --

16 A. Statewide. It's been diluted, and no
17 matter how my representative present my views, when it
18 comes to the vote, then I get -- then you're kind of
19 left out.

20 Q. Can you explain to me -- could they have
21 put you in another district and --

22 A. Um-hmm.

23 Q. They could have? And it would have made
24 your vote better or more -- or stronger?

25 A. Didn't understand --

1 Q. You said by being placed in a district
2 seat, the congressional district 1, it's been diluted.
3 Is there a way they could have placed you in a
4 different district that you feel would have made your
5 vote be at full strength?

6 A. Not unless they changed the party -- I
7 mean, the whole totality of the state.

8 Q. So your challenge really isn't to the way
9 congressional district 1 is drawn, it's to the overall
10 effect of how you think the plan affects Democratic
11 voters?

12 A. That's correct.

13 Q. Okay. Do you feel that our Congressman
14 Butterfield has represented your interest well?

15 A. He's represented.

16 Q. Do you find him to be very responsive?

17 A. I find him to be very responsive and
18 accessible.

19 Q. Okay. So it's not that you have a
20 problem with Congressman Butterfield representing you?

21 A. No.

22 Q. Okay. Can I ask you -- now, you got me
23 curious. I want to know how successful you are. Do
24 you know of anyone who used to vote for Republicans
25 that now votes Democrat?