

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 WILLIAM COLLINS
TAKEN ON BEHALF OF THE DEFENDANTS
WILLIAMSTON, NORTH CAROLINA
March 30, 2017

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1 me about what would be a more fair --

2 A. No, I can't tell you that. I'll leave
3 that to the experts, but I just know 10 to 3 is not --
4 don't look right.

5 Q. Didn't look right to you.

6 Okay. And so you had a conversation with
7 Jeremy in September of last year, and he was telling
8 you about challenging the district, that they had been
9 wrong. Did you have any plans before you talked with
10 Jeremy about filing a lawsuit to challenge the plan?

11 A. No, I didn't.

12 Q. Okay. Is it safe to say you probably
13 wouldn't have filed your own lawsuit if Jeremy hadn't
14 contacted you?

15 MS. RIGGS: Objection. Calls for
16 speculation, but you can answer the question.

17 A. Probably not.

18 MR. ERWIN: Okay. I was just asking him
19 to testify about what his personal knowledge was about
20 what he would have done.

21 BY MR. ERWIN:

22 Q. Now, do you currently reside in the first
23 congressional district?

24 A. Yes.

25 Q. And who is your representative?

1 A. P.K. Butterfield.

2 Q. Okay. From 2002 to the present, have you
3 always lived in congressional district 1, or have you
4 lived in any other North Carolina district?

5 A. I'm always here in congressional district
6 1.

7 Q. Okay. And do you always vote in the
8 congressional elections, or have you voted in
9 congressional elections from 2002 to the present?

10 A. Yes.

11 Q. Okay. In your discovery responses that
12 we were referencing a minute ago, when -- there was a
13 question in there, and I will point you to it in one
14 second, that asked you about what you thought the harms
15 were being caused that you were challenging in this
16 lawsuit, and I believe you said you felt that as a
17 Democrat, your vote was being diluted. I don't want to
18 put words in your mouth.

19 So it's going to be interrogatory number
20 four, and I'll -- right there at the top of the page,
21 and again, I'll hand you Collins Exhibit 1, and it
22 says, if you want to read along with me: I came to be
23 a Plaintiff in this lawsuit because of the harm I
24 experienced after being subjected to an election during
25 the -- using the 2016 congressional redistricting plan,

1 A. No, never did that.

2 Q. Have you canvassed neighborhoods and
3 passed out flyers for political candidates?

4 A. No.

5 Q. You said that -- in your discovery
6 responses, that you were a member of the Democratic
7 party. Have you ever participated in any activities
8 with the Democratic party?

9 A. Yes.

10 Q. And what were some of those activities
11 that you participated in?

12 A. Precinct meetings, discussing with other
13 people the voting time for elections and who would be
14 good candidates and stuff like that.

15 Q. How often do you attend precinct
16 meetings?

17 A. Probably really --

18 Q. Once a year, is that what you said?

19 A. No, not once a year. Sometimes I don't
20 attend them.

21 Q. Okay. Any other activities besides
22 precinct meetings and discussing with people?

23 A. No.

24 Q. Mr. Collins, would you explain to me do
25 you feel personally harmed by the way this plan is