

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

COMMON CAUSE, et al.,)
)
Plaintiffs,)
vs.) Civil Action No.
) 1:16-CV-2016-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,)
vs.) Civil Action No.
) 1:16-CV-1164
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 2016 Joint)
Select Committee on)
Congressional Redistricting,)
et al,)
)
Defendants.)
)

DEPOSITION OF ANNETTE LOVE

11:05 A.M.

FRIDAY, APRIL 7, 2017

SOUTHERN COALITION FOR SOCIAL JUSTICE
1415 WEST HIGHWAY 54, SUITE 101
DURHAM, NORTH CAROLINA

1 Q. And this is something I have to ask, and please
2 don't take offense to it, but is there any
3 reason why you wouldn't be able to tell the
4 truth here today in your deposition?

5 A. Absolutely not.

6 Q. Ms. Love, are you married?

7 A. No, I'm not.

8 Q. And what is your address?

9 A. 346 East Lakewood Avenue, Apartment 302, Durham
10 27707.

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

12 A. Almost two years.

13 Q. Where did you live before that?

14 A. 2016 Collier Drive, Durham 27707.

15 Q. And how long did you live at that address?

16 A. A little over ten years.

17 Q. Where did you go to high school, Ms. Love?

18 A. Hoke County High School in Raeford,
19 North Carolina.

20 Q. What year did you graduate down there?

21 A. 1974.

22 Q. And did you go to college after that?

23 A. I did.

24 Q. Where did you go to school at?

25 A. Durham Business College.

1 that packet and we'll look at the response
2 that's at the top of the page.

3 In that response, you said that you
4 joined this lawsuit because you felt like you
5 had been harmed because the 2016 Redistricting
6 Plan diluted the strength of your vote solely
7 because you were a Democrat.

8 Did I read that correctly?

9 A. Yes.

10 Q. Can you explain to me what you mean by that?

11 A. The harm is because the district being
12 represented in Washington, to me, is unfair.
13 Having the numbers -- we have 3 representatives
14 there versus I believe it's 10, and I'm all
15 about fairness.

16 Q. Okay. So your problem is with the plan as a
17 whole, not your specific district?

18 A. Absolutely.

19 Q. Okay. Would you -- you would agree with me,
20 though, that congressional races in
21 North Carolina, they're not at-large races? You
22 don't get to vote for everybody's congressional
23 district, you only get to vote for your own?

24 A. Yes.

25 Q. What -- so how do you think the congressional

1 way that person's name sounds?

2 A. That's their choice.

3 Q. Do you think that people might choose to vote
4 for a candidate because that candidate ran more
5 TV ads and they saw them more than any other
6 candidate?

7 A. That's their choice.

8 Q. Do you think that people might vote for someone
9 because that person is a celebrity and they know
10 them from being a celebrity?

11 A. That's their choice.

12 Q. Do you think someone who is a registered
13 Democrat could vote for a family member who is
14 running for office even though that family
15 member was running as a Republican?

16 A. That's their choice.

17 Q. Okay. But it's a possibility?

18 A. That's their choice.

19 Q. Okay. And there's never any situation in which
20 you could vote for a Republican?

21 A. Never.

22 Q. No matter who was running as a Democrat?

23 A. No.

24 Q. So you vote -- so it wouldn't matter what their
25 stance was on the issues as long as it said

1 Q. Were you familiar with or did you have any kind
2 of interactions with the state League of Women
3 Voters before you got involved in this lawsuit?

4 A. No.

5 Q. What about the organization Common Cause?

6 A. No.

7 Q. If you'll look with me on Love Exhibit 1, look
8 at the bottom of Page 7. The question starts
9 there, and your response is on Page 8. This
10 question asks you to talk about any political
11 activities you've taken part in in the last
12 15 years.

13 And your response was -- correct me if
14 I'm wrong, your response was in the last
15 15 years, you've not held any position in any
16 political party; is that correct?

17 A. No.

18 Q. Did I read that correctly?

19 A. In the last 15 years, I have not held a position
20 in any political party.

21 Q. And that's correct, right?

22 A. That's correct.

23 Q. Have you taken part in any other kind of
24 political activities? Have you been involved
25 with get-out-the-vote drives?

1 A. Not to get-out-the-vote drives, but I have
2 volunteered at precincts.

3 Q. Okay. And when was the last time you
4 volunteered at a precinct?

5 A. Last voting.

6 Q. So in the 2016 election?

7 A. Yes.

8 Q. And were you a poll observer or were you handing
9 out fliers at the --

10 A. Handing out fliers and talking with people.

11 Q. And do you remember what candidates you were
12 handing out fliers for?

13 A. Not really. It was just for the Democratic
14 ticket.

15 Q. Okay. So you were handing out fliers promoting
16 voting for Democratic candidates?

17 A. Yes.

18 Q. Who asked you to do that?

19 A. There is a lady that I'm familiar with, that's
20 her precinct that she works with, and she asked
21 me to volunteer if I had some time.

22 Q. And what's her name? Do you know?

23 A. Lottie Hayes.

24 Q. And have you been involved in anything like
25 phone banks or canvassing neighbors and passing