

# **Exhibit B**

**Rodney D. Pierce and Moses Matthews v. The North Carolina State Board of Elections, et al.**  
**4:23-cv-193-D (E.D.N.C.)**

**Plaintiffs' Exhibit List**

<b>PX Exhibit Number</b>	<b>Date</b>	<b>Description</b>	<b>Objection(s)</b>	<b>Notes</b>
PX1	5/31/2024	Expert Report of Dr. Jonathan Mattingly	Hearsay*	Plaintiffs do not necessarily intend to offer into evidence every document disclosed on their exhibit list, and some of the documents disclosed on Plaintiffs' exhibit list would be admissible if offered by Plaintiffs, but not if offered by Legislative Defendants (for instance, because the document contains out-of-court statements that constitute inadmissible hearsay when offered by Legislative Defendants).
PX2		CV-Dr. Jonathan Mattingly	Hearsay*	
PX3		Demonstration District A [Map 1 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX4		Demonstration District B [Map 2 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX5		Demonstration District C [Map 3 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX6		Demonstration District D [Map 4 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX7		NC Senate Clusters [Figure 1 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX8		Possible Options in regions A,B,C,D of the NC Senate County Clusterings [Figure 2 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	Hearsay* = Objection will be withdrawn pursuant to agreement with counsel regarding if/when an expert testifies as to the contents of his or her respective report(s)
PX9		NC House Clusters [Figure 3 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX10		Possible Options in regions A,B,C,D of the NC House County Clusterings [Figure 4 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX11		NC Senate Clusters which vary across the 16 different possible clusterings of the entire state [Table 1 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX12		NC House Clusters which vary across the 8 different possible clusterings of the entire state [Table 2 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX13		NC Senate Clusters which are fixed across all 16 of the possible clustering maps [Table 3 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX14		NC House Clusters which are fixed across all 8 of the possible clustering maps [Table 4 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX15		Number of districts followed by the number of incumbents within the cluster (Fixed clusters in the NC Senate) [Figure 5 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX16		Number of districts followed by the number of incumbents within the cluster (Optional clusters in the NC Senate) [Figure 6 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	

PX17		Number of districts followed by the number of incumbents within the cluster (Fixed clusters in the NC House) [Figure 7 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX18		Number of districts followed by the number of incumbents within the cluster (Optional clusters in the NC House) [Figure 8 to Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX19		North Carolina Clustering Option to Minimize County Splits (Mattingly Rep. footnote 5)	Hearsay*	
PX20		North Carolina Map Option to Minimize County Splits (Mattingly Rep. footnote 6)	Hearsay*	
PX21	5/31/2024	Expert Report of Dr. Traci Burch	Hearsay*	
PX22		CV-Dr. Traci Burch	Hearsay*	
PX23		1992-93 to 2022-23 End of Grade General Test Results - Statewide Percent of Students at or Above Proficiency in <u>Both</u> Reading and Mathematics ; Grades 3-8 [Figure 1 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX24		2008-09 to 2022-23 End-of-Grade Test Results- All Assessments Combined Statewide Percent of Students At of Above Proficiency in <u>Both</u> Reading and Mathematics; Grades 3-8 [Figure 1a to Expert Report of Dr. Traci Burch]	Hearsay*	
PX25		2002-03 to 2022-23 End-of-Grade Test Results- (Altrenate Assessments) Statewide Percent of Students At of Above Proficiency in <u>Both</u> Reading and Mathematics; Grades 3-8 [Figure 1b to Expert Report of Dr. Traci Burch]	Hearsay*	
PX26		1992-93 to 2022-23 End of Grade General Test Results - Statewide Percent of Students at or Above Proficiency in Both Reading and Mathematics ; Grades 3-8; for All Ethnicities (continued) [Figure 2b to Expert Report of Dr. Traci Burch]	Hearsay*	
PX27		Average Reading Scores, by Race, 2018. [Figure 2 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX28		Average Math Scores, by Race, 2018. [Figure 3 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX29		Less than High School Diploma, by Race. [Figure 4 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX30		Bachelor's Degree or higher, by Race. [Figure 5 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX31		Unemployment, by Race. [Figure 6 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX32		Median Household Income by Race. [Figure 7 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX33		Family Poverty, by Race. [Figure 8 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX34		Life Expectancy at Birth 2018-2021. [Figure 9 to Expert Report of Dr. Traci Burch]	Hearsay*	

PX35		Census Tracts with Low Income and Low Access to Supermarkets [Figure 10 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX36	5/31/2024	Expert Report of Dr. Loren Collingwood	Hearsay*	
PX37		CV-Dr. Loren Collingwood	Hearsay*	
PX38		List of general election contests analyzed between 2020-22. [Table 1 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX39		List of general election contests analyzed between 2016-18. [Table 2 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX40		Racially Polarized Voting Analysis-Statewide. [Figure 1 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX41		Racially Polarized Voting Analysis-District: SS2023-D1. [Figure 2 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX42		Racially Polarized Voting Analysis-District: SS2023-D2. [Figure 3 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX43		Racially Polarized Voting Analysis-District: 12-County Demonstration Area. [Figure 4 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX44		Electoral Performance Results, 2022, 2023-enacted State Senate Districts 1 and 2. [Figure 5 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX45		Electoral Performance Results, 2020, 2023-enacted State Senate Districts 1 and 2. [Figure 6 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX46		Electoral Performance Results, 2018, 2023-enacted State Senate Districts 1 and 2. [Figure 7 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX47		Electoral Performance Results, 2016, 2023-enacted State Senate Districts 1 and 2. [Figure 8 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX48		Electoral Performance Results, 2022, Demonstration District. [Figure 9 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX49		Electoral Performance Results, 2020, Demonstration District. [Figure 10 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX50		Electoral Performance Results, 2018, Demonstration District. [Figure 11 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX51		Electoral Performance Results, 2016, Demonstration District. [Figure 12 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX52		Electoral Performance Results, 2016, Demonstration District. [Figure 12 to Expert Report of Dr. Loren Collingwood]	Hearsay*	

<b>PX53</b>		Black VAP simulation analysis, All 2020-2022 contests. [Figure 13 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX54</b>		Racially polarized voting 2022 contests-Statewide. [Figure 14 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX55</b>		Racially polarized voting 2022 contests-Enacted State Senate Districts 1 and 2. [Figure 15 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX56</b>		Racially polarized voting 2022 contests-Demonstration district county area. [Figure 16 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX57</b>		Racially polarized voting 2020 contests-Statewide. [Figure 17 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX58</b>		Racially polarized voting 2020 contests-Enacted State Senate Districts 1 and 2. [Figure 18 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX59</b>		Racially polarized voting 2020 contests-Demonstration district county area. [Figure 19 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX60</b>		Racially polarized voting 2018 contests-Statewide. Collapsed Republican candidates. [Figure 20 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX61</b>		Racially polarized voting 2018 contests-Statewide. Keep Republican candidates separate. [Figure 21 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX62</b>		Racially polarized voting 2018 contests-Enacted State Senate Districts 1 and 2. Collapsed Republican candidates. [Figure 22 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX63</b>		Racially polarized voting 2018 contests-Enacted State Senate Districts 1 and 2. Keep Republican candidates separate. [Figure 23 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX64</b>		Racially polarized voting 2018 contests-Demonstration district county area. Collapsed Republican candidates. [Figure 24 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX65</b>		Racially polarized voting 2018 contests-Demonstration district county area. Keep Republican candidates separate. [Figure 25 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX66</b>		Racially polarized voting 2016 contests. Statewide. [Figure 26 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX67</b>		Racially polarized voting 2016 contests.Enacted State Senate Districts 1 and 2. [Figure 27 to Expert Report of Dr. Loren Collingwood]	Hearsay*	

PX68		Racially polarized voting 2016 contests. Demonstration district county area. [Figure 28 to Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX69	5/31/2024	Expert Report of Blakeman B. Esselstyn	Hearsay*	
PX70	8/2024	CV-Updated Blakeman B. Esselstyn [Attachment A to Expert Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
PX71		Majority-Black North Carolina counties [Figure 1 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX72		Voting districts classified by Black voting age population [Figure 2 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX73		Two county cluster alternatives for northeastern North Carolina [Figure 3 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX74		Other clusterings used for eastern North Carolina after 2020 [Figure 4 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX75		Selected enacted 2022 North Carolina State Senate districts [Figure 5 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX76		Statistics for selected districts in enacted 2022 NC Senate Plan [Table 1 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX77		Selected enacted 2023 North Carolina State Senate districts [Figure 6 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX78		Statistics for selected districts in enacted 2023 NC Senate Plan [Table 2 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX79		Map of Demonstration District A [Figure 7 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX80		Statistics for Demonstration District A [Table 3 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX81		Differing county groupings used in Demonstration Map A [Figure 8 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX82		Demonstration Map A districts that differ from enacted 2023 plan [Figure 9 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX83		Statistics for additional districts in Demonstration Map A [Table 4 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX84		Map of Demonstration District B [Figure 10 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX85		Statistics for Demonstration Districts B and B-2 [Table 5 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	

<b>PX86</b>		Demonstration Map B [Figure 11 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX87</b>		Map of Demonstration District C [Figure 12 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX88</b>		Statistics for Demonstration District C [Table 6 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX89</b>		Modify county groupings used in Demonstration Map C [Figure 13 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX90</b>		Demonstration Map C districts differing from enacted 2023 plan [Figure 14 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX91</b>		Statistics for additional districts in Demonstration Map C [Table 7 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX92</b>		Map of Demonstration District D [Figure 15 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX93</b>		Statistics for Demonstration District D and D-2 [Table 8 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX94</b>		Demonstration Map D [Figure 16 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX95</b>		Compactness scores for enacted and demonstration districts [Table 9 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX96</b>		Compactness score comparison for Demonstration Map A [Table 10 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX97</b>		Compactness score comparison for Demonstration Maps B & D [Table 11 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX98</b>		Compactness score comparison for Demonstration Map C [Table 12 to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX99</b>		Data, software, and methodology information [Attachment B to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX100</b>		Demographic summary for North Carolina counties [Attachment C to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX101</b>		2022 Senate Plan "Stat Pack" [Attachment D to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX102</b>		Enacted 2022 Senate plan demographic summary [Attachment D to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX103</b>		Citizen Voting Age Population (CVAP) Statistics [Attachment D to Expert Report of Blakeman B. Esselstyn]	Hearsay*	

PX104		2023 Senate Plan "Stat Pack w Race" [Attachment E to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX105		Enacted 2023 plan CVAP statistics [Attachment E to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX106		Demographic summaries for Demonstration Maps A,B,C & D [Attachment F to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX107		CVAP statistics for Demonstration Maps A, B, C, & D [Attachment F to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX108	10/1/2023	2023 Senate Plan Criteria [Attachment G to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX109		Descriptions of compactness measures [Attachment H to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX110		Enacted Senate plan compactness reports (2022 & 2023) [Attachment I to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX111		Enacted 2023 Senate plan district subset compactness reports [Attachment I to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX112		Demonstration Map A,B,C, and D compactness reports [Attachment I to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX113		Political Subdivision Split Comparative Summary [Attachment j to Expert Report of Blakeman B. Esselstyn]	Hearsay*	
PX114	8/30/2024	Rebuttal Expert Report of Dr. Jonathan Mattingly	Hearsay*; and as to Demonstration District E, Rule 403 and improper rebuttal evidence	
PX115		Demonstration District A [Figure 1 to Rebuttal Expert Report of Dr. Jonathan Mattingly]	Hearsay*	
PX116		Demonstration District E [Figure 2 to Rebuttal Expert Report of Dr. Jonathan Mattingly]	Hearsay*; Rule 403; improper rebuttal evidence	
PX117	9/9/2024	Rebuttal Expert Report of Dr. Traci Burch	Hearsay*	
PX118		Average Reading Scores, by Race, 2018. [Figure 2 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX119		Average Math Scores, by Race, 2018. [Figure 3 to Expert Report of Dr. Traci Burch]	Hearsay*	
PX120		Black Enrollment at State Universities in North Carolina [Table 1 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
PX121	4/4/2024	Article "Mark Robinson could be North Carolina's first Black governor. Can he win over Black Voters?" Raleigh News & Observer, [Figure 3 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
PX122	3/18/2024	Article - "The Daily Show" takes aim at NC-- again saying Lt. Gov. Mark Robinson hates everybody" Raleigh News & Observer [Figure 4 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	



<b>PX123</b>	12/6/2023	Facebook Post by Mark Robinson [Figure 5 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
<b>PX124</b>	1/23/2020	Article from News & Observer, "Planned Parenthood founded to destroy the entire black race, NC governor candidate says" [Figure 6 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
<b>PX125</b>	10/28/2023	Article- "NC Democrats Slam Bishop for 'Racist' Post About Jeff Jackson's TikTok Use." The News and Observer [Figure 7 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
<b>PX126</b>	2/29/2024	Article - "Republicans vow to fight the 'woke agenda' in election ads. What does that even mean?" News & Observer [Figure 8 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
<b>PX127</b>	11/8/2022	Article- "Bolstered by Attack Ads, Conservative Republican Wins North Carolina Senate Seat" The New York Times [Figure 9 to Rebuttal Expert Report of Dr. Traci Burch]	Hearsay*	
<b>PX128</b>	8/30/2024	Expert Rebuttal Report of Dr. Loren Collingwood	Hearsay*; and as to Demonstration District E, Rule 403 and improper rebuttal evidence	
<b>PX129</b>		X-plot showing 2020 gubernatorial candidate vote as a function of precinct BVAP racial demographics [Figure 1 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX130</b>		2020 elections results in precincts with BVAP between 37-40% Demonstration area [Table 1 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX131</b>		Analysis comparing various ways for estimating CVAP MOE shows that Dr. Trende's block group method produces highly unrealistic and unreliable MOE estimates [Table 2 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX132</b>		Units and values used to estimate overall Black CVAP% MOE for Demonstration District B-1 [Table 3 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX133</b>		Units and values used to estimate overall Black CVAP% MOE for Demonstration District D-1 [Table 4 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX134</b>		MOE analysis for enacted state legislative districts, 2022 CVAP [Table 5 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
<b>PX135</b>		Trende's Figure 2 replicated with Block Group label for the two block groups that are not in the illustrative plan (B-1 Illustrative Plan Pasquotank County) [Figure 2 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	

PX136		Trende's Figure 2 replicated with Block Group label for the two block groups that are not in the illustrative plan (D-1 Illustrative Plan Pasquotank County) [Figure 3 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX137		Trende's Figure 16 racial dotplot [Figure 4 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX138		Trende's Figure 16 racial dotplot with alpha parameters swapped between whites and Blacks [Figure 5 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX139		Electoral Performance Results, 2022, Enacted District 5 (Edgecombe and Pitt Counties) [Figure 6 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX140		Electoral Performance Results, 2020, Enacted District 5 (Edgecombe and Pitt Counties) [Figure 7 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX141		Electoral Performance Results, 2018, Enacted District 5 (Edgecombe and Pitt Counties) [Figure 8 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX142		Electoral Performance Results, 2016, Enacted District 5 (Edgecombe and Pitt Counties) [Figure 9 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*	
PX143		Electoral Performance Results, 2022, Illustrative District E [Figure 10 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*; Rule 403; improper rebuttal evidence	
PX144		Electoral Performance Results, 2020, Illustrative District E [Figure 11 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*; Rule 403; improper rebuttal evidence	
PX145		Electoral Performance Results, 2018, Illustrative District E [Figure 12 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*; Rule 403; improper rebuttal evidence	
PX146		Electoral Performance Results, 2016, Illustrative District E [Figure 13 to Rebuttal Expert Report of Dr. Loren Collingwood]	Hearsay*; Rule 403; improper rebuttal evidence	
PX147	8/30/2024	Rebuttal Report of Blakeman B. Esselstyn	Hearsay*; and as to Demonstration District E, Rule 403 and improper rebuttal evidence	
PX148		Statistics for selected districts in enacted 2022 NC Senate Plan [Table 1a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
PX149		Statistics for selected districts in enacted 2023 NC Senate Plan [Table 2a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
PX150		Statistics for Demonstration District A [Table 3a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	

<b>PX151</b>		Statistics for additional districts in Demonstration Map A [Table 4a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX152</b>		Statistics for Demonstration Districts B and B-2 [Table 5a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX153</b>		Statistics for Demonstration District C [Table 6a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX154</b>		Statistics for additional districts in Demonstration Map C [Table 7a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX155</b>		Statistics for Demonstration Districts D and D-2 [Table 8a to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX156</b>		Demonstration Map E [Figure 1 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	
<b>PX157</b>		Statistics for Demonstration Districts E and E-2 [Table 9 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	
<b>PX158</b>		Compactness score comparison for Demonstration Map E [Table 10 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	
<b>PX159</b>		Dr. Trende's Figure 24 (reproduced) [Figure 2 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX160</b>		Dr. Trende's Figure 23 with Fishing Creek precinct boundary [Figure 3 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX161</b>		Details from Dr. Trende Figure 23 (arrows added) [Figure 4 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX162</b>		Comparison of two dot density maps by different mapmakers [Figure 5 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX163</b>		Example of map highlighting lines that should have been omitted [Figure 6 to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX164</b>		Data sources, software, and methodology [Attachment B to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX165</b>		Citizen Voting Age Population (CVAP) Statistics [Attachment C to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX166</b>		Demographic summaries for Demonstration Map E [Attachment D to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	
<b>PX167</b>		Measures of compactness measures for Demonstration Map E [Attachment E to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	

<b>PX168</b>		Map of Elizabeth City Precincts [Attachment F to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*; Rule 403; improper rebuttal evidence	
<b>PX169</b>		Map of Demonstration District A [Attachment G to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX170</b>		Map of Demonstration District C [Attachment H to Rebuttal Report of Blakeman B. Esselstyn]	Hearsay*	
<b>PX171</b>	9/10/2012	NPR Article titled, "Political Pro with Race-Baiting Past Doesn't See It in Romney's Welfare Charge" [Exhibit 4 to deposition of Donald T. Critchlow, PH.D]	Hearsay; relevance; authentication	
<b>PX172</b>		Printout from WRAL website, Gallery: Posts from Mark Robinson's Facebook page [Exhibit 5 to deposition of Donald T. Critchlow, PH.D]	Hearsay; authentication; rule of completeness	
<b>PX173</b>	2/19/2018	Facebook Post by Mark Robinson [Exhibit 6 to deposition of Donald T. Critchlow, PH.D]	Hearsay; authentication	
<b>PX174</b>	12/6/2023	Facebook Post by Mark Robinson [Exhibit 7 to deposition of Donald T. Critchlow, PH.D]	Hearsay; authentication	
<b>PX175</b>	10/25/2022	New York Times article, "With Ads, Imagery and Words, Republicans Inject Race Into Campaigns." [Exhibit 8 to deposition of Donald T. Critchlow, PH.D]	Hearsay	
<b>PX176</b>	10/27/2022	Newsmax article, "Willie Horton-Type Ad Gives Boost to N.C.'s Budd." [Exhibit 9 to deposition of Donald T. Critchlow, PH.D]	Hearsay; authentication	
<b>PX177</b>	10/18/2022	Press release from the North Carolina Democratic Party, "I'm Ted Budd & I Approve This Lie."	Hearsay; authentication	
<b>PX178</b>	6/17/2011	Joint Statement by Senator Bob Rucho, Chair of the Senate Redistricting Committee and Representative David Lewis, Chair of the House Redistricting Committee [Exhibit 1 to the deposition of Senator Ralph Hise - Vol.I]	Hearsay; Rule 403; improper character evidence	
<b>PX179</b>	10/22/2023	Letter from K. Oskooii to Senator Phil Berger et al. subject "Racially Polarized Voting in North Carolina and its Effect on the 2023 Redistricting Plans." [Exhibit 5 to the deposition of Senator Ralph Hise - Vol.I]	Hearsay; Rules 702, 703 and 705; improper/undisclosed expert testimony	
<b>PX180</b>	4/28/2023	Email from T. Moore to Senator R. Hise subject "NC Supreme Court Delivers Rulings to Reinstate Voter ID, Affirm Legislature's Redistricting Authority, End Felon Voting." [Exhibit 8 to the deposition of Senator Ralph Hise - Vol.I]		
<b>PX181</b>	6/29/2023	Email from J. Wilkie to Senator R. Hise subject "The Guardian US Interview request: Moore v. Harper and Allen v. Milligan rulings." [Exhibit 9 to the deposition of Senator Ralph Hise - Vol.I]	Hearsay	

<b>PX182</b>	8/1/2023	Email from B. Elkey to Senator R. Hise subject "Tomorrow! August 2- 2:00 p.n. EST: Current Research on Redistricting of Legislative Boundaries [Exhibit 10 to the deposition of Senator Ralph Hise - Vol.I]	Hearsay	
<b>PX183</b>	9/14/2023	Appointment reminder from Senator R. Hise, subject "Redistricting conference call" [Exhibit 11 to the deposition of Senator Ralph Hise - Vol.I]		
<b>PX184</b>	9/25/2023	Senate Notice of Committee Meeting and Bill Sponsor Notice [Exhibit 12 to the deposition of Senator Ralph Hise - Vol.II]		
<b>PX185</b>	9/25/2023	Email from D. Somers to Sen. W. Daniel et al., subject "Redistricting Concerns [Exhibit 13 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay	
<b>PX186</b>		Map of 2011 and 2001 Redistricting Public Housing Sites and 2016 Legislative Calendar [Exhibit 15 to the deposition of Senator Ralph Hise - Vol.II]		
<b>PX187</b>	9/25/2023	Email from T. Daye to Senator W. Daniel et al., subject "NC 2023 Redistricting Process [Exhibit 16 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay	
<b>PX188</b>	9/25/2023	Email from E. Hairston to Senator W. Daniel et al. subject "Redistricting An Atrocity of Epic Proportions." [Exhibit 18 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; Relevance	
<b>PX189</b>	10/3/2023	Email from C. Stokes to Senator W. Daniel et al., subject "Redistricting Criteria Letter" with attachment titled "Letter 2023 North Carolina Redraw." [Exhibit 22 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay	
<b>PX190</b>	10/22/2023	Email from C. Shenton to Senator W. Daniel et al., subject "Correspondence re: Racially Polarized Voting and its Effect on the 2023 Redistricting Plans with attachments [Exhibit 25 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; Rules 702, 703, and 705; improper/undisclosed expert testimony	
<b>PX191</b>	9/19/2023	Email from S. Shapiro to Senator P. Berger et al., subject "Re: Prospective 2024 Congressional Districts --Particular Impact to Guilford County" [Exhibit 26 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper lay witness testimony; Rule 403 (confuses the issues)	
<b>PX192</b>	10/25/2023	Email from A. Brown to Senator R. Hise subject "Redistricting" [Exhibit 48 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance	
<b>PX193</b>	10/21/2023	Email from S. Shapiro to Rep. T. Moore et al., subject "Suggested Revisions to Congressional Map CCJ-1" [Exhibit 49 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper lay witness testimony; Rule 403	
<b>PX194</b>		Screenshot from Senator Ralph Hise Campaign [Exhibit 50 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; Rule 403	
<b>PX195</b>		Screenshot from Senator R. Hise Facebook page "Say No to Critical Race Theory" and link to YouTube "We Won't Know" [Exhibit 54 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; Rule 403	

<b>PX196</b>		District 6 Map [Exhibit 57 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper/undisclosed expert opinion; Rule 403; authentication	
<b>PX197</b>		District 12 Map showing Black and White voters in 2022 and 2024 [Exhibit 58 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper/undisclosed expert opinion; Rule 403; authentication	
<b>PX198</b>		Dot Density Map of Race, 2023 District 1 Boundaries and 2022 District 1 Boundaries, Oxford, NC Area [Exhibit 59 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper/undisclosed expert opinion; Rule 403; authentication	
<b>PX199</b>		Dot Density Map of Race, 2023 District 1 Boundaries, and 2022 District 1 Boundaries, Northeast North Carolina [Exhibit 60 to the deposition of Senator Ralph Hise - Vol.II]	Hearsay; relevance; improper/undisclosed expert opinion; Rule 403; authentication	
<b>PX200</b>	5/2024	Report- Ayscue, Jennifer B. et al."Can our Schools Capture the Educational Gains of Diversity? North Carolina School Segregation, Alternatives, and Possible Gains." [Exhibit 4 to the deposition of Andrew Taylor]	Hearsay	
<b>PX201</b>	2022	Nation's Report Card 2022 math state report for North Carolina for grade 4 math scores [Exhibit 5 to the deposition of Andrew Taylor]	Hearsay	
<b>PX202</b>	2022	Nation's Report Card 2022 math state report for North Carolina for grade 8 math scores [Exhibit 6 to the deposition of Andrew Taylor]	Hearsay	
<b>PX203</b>	2022	Nation's Report Card 2022 reading state report for North Carolina for grade 4 reading scores [Exhibit 7 to the deposition of Andrew Taylor]	Hearsay	
<b>PX204</b>	2022	Nation's Report Card 2022 reading state report for North Carolina for grade 8 reading scores [Exhibit 8 to the deposition of Andrew Taylor]	Hearsay	
<b>PX205</b>		Screen shot of the Ed Opportunity segregation scores [Exhibit 9 to the deposition of Andrew Taylor]	Hearsay	
<b>PX206</b>	2020	Printout from the Census Bureau website Tallies page [Exhibit 6 to the deposition of Sean Trende]	Hearsay	
<b>PX207</b>		Printout from the website of the North Carolina Office of State Budget and Management [Exhibit 7 to the deposition of Sean Trende]	Hearsay	
<b>PX208</b>		Printout from the website of the North Carolina Office of State Budget and Management [Exhibit 8 to the deposition of Sean Trende]	Hearsay	
<b>PX209</b>		Calculating Measures of Error for Derived Estimates. American Community Survey Handbook - Chapter 8 [Exhibit 9 to the deposition of Sean Trende]	Hearsay	
<b>PX210</b>		R Code [Exhibit 10 to the deposition of Sean Trende]		
<b>PX211</b>	10/22/2023	Letter from H.H. Klein to Senator P. Berger re: Racially Polarized Voting in North Carolina and its Effect on the 2023 Redistricting Plans [Exhibit 8 to the deposition of Daniel Blue]	Hearsay; Rules 702, 703, and 705; improper/undisclosed expert testimony	

<b>PX212</b>		Report -Access to Healthcare in Rural North Carolina [Exhibit 5 to the deposition of Dr. Traci Burch]		
<b>PX213</b>		North Carolina Sample Size Rates [Exhibit 6 to the deposition of Dr. Traci Burch]		
<b>PX214</b>		North Carolina Response Rates and Reasons for Noninterviews [Exhibit 7 to the deposition of Dr. Traci Burch]		
<b>PX215</b>		Printout from the ACS website titled "Item Allocation Rates Definitions" [Exhibit 8 to the deposition of Dr. Traci Burch]		
<b>PX216</b>		North Carolina Allocation Rates 2019-2023 [Exhibit 9 to the deposition of Dr. Traci Burch]		
<b>PX217</b>		Welfare benefits or Temporary Assistance for Needy Families (TANF) [Exhibit 11 to the deposition of Dr. Traci Burch]		
<b>PX218</b>	2019	EdBuild.org report [Exhibit 12 to the deposition of Dr. Traci Burch]		
<b>PX219</b>	8/11/2016	Opinion in Covington v. North Carolina (1:15-cv-399) [Exhibit 14 to the deposition of Dr. Traci Burch]	Hearsay	
<b>PX220</b>	6/30/1986	Opinion in Thornburg v. Gingles (No. 83-1968) [Exhibit 15 to the deposition of Dr. Traci Burch]	Hearsay	
<b>PX221</b>	3/17/2022	Article- New Statistics Available from the 2016-2020 ACS 5-Year Estimates [Exhibit 14 to the deposition of Blake Esselstyn]		
<b>PX222</b>		2024 North Carolina Republican Party Platform	Hearsay; relevance; Rule 403; authentication	
<b>PX223</b>	6/18/2022	2022 North Carolina Democratic Party Platform	Hearsay; relevance; Rule 403; authentication	
<b>PX224</b>		2024 North Carolina Democratic Party Platform	Hearsay; relevance; Rule 403; authentication	
<b>PX225</b>		2024 National Republican Party Platform	Hearsay; relevance; Rule 403; authentication	
<b>PX226</b>		2022 North Carolina Republican Party Platform	Hearsay; relevance; Rule 403; authentication	
<b>PX227</b>	7/15/1993	Opinion in Hines, et al.v. Mayor and Town Council of Ahoskie, et al. 998 F. 2d 1266 (1993)	Hearsay; improper character evidence	
<b>PX228</b>	7/10/1984	Opinion in Johnson, et al. v. Halifax County, et al. 594 F. Supp. 161 (1984)	Hearsay; improper character evidence	
<b>PX229</b>	12/17/1991	Opinion in Ward, et al. v. Columbus County, North Carolina, et al. 782 F. Supp. 1097 (1991)	Hearsay; improper character evidence	
<b>PX230</b>	7/29/2016	Opinion in North Carolina State Conference of the NAACP, et al. v. McCrory, et al. 831 F. 3d 204 (2016)	Hearsay; improper character evidence	
<b>PX231</b>	12/2/2020	Opinion in North Carolina State Conference of the NAACP, et al. v. Raymond, et al. 981 F. 3d 295 (2020)	Hearsay; improper character evidence	

<b>PX232</b>	6/5/2017	Opinion in North Carolina, et al. v. Covington, et al. 581 U.S. 1015 (2017)	Hearsay; improper character evidence	
<b>PX233</b>	5/22/2017	Opinion in Cooper, et al. v. Harris, et al. 581 U.S. 285 (2017)	Hearsay; improper character evidence	
<b>PX234</b>	2/5/2016	Opinion in Harris, et al. v. McCrory, et al. 159 F. Supp. 3d 600 (2016)	Hearsay; improper character evidence	
<b>PX235</b>	12/31/2019	Opinion in North Carolina State Conference of the NAACP, et al. v. Cooper, et al. 430 F. Supp.3d 15 (2019)	Hearsay; improper character evidence	
<b>PX236</b>	10/1/2014	Opinion in League of Women Voters of North Carolina et al. v. State of North Carolina, et al. 769 F. 3d 224 (2014)	Hearsay; improper character evidence	
<b>PX237</b>	4/22/2024	Opinion in North Carolina A. Philip Randolph Institute, et al. v. North Carolina State Board of Elections, et al. 2024 WL 1719366	Hearsay; improper character evidence	
<b>PX238</b>	1/21/2024	Opinion in Voto Latino, et al. v. Hirsch, et al. 712 F. Supp.3d 637 (2024)	Hearsay; improper character evidence	
<b>PX239</b>	3/13/2024	Opinion in North Carolina State Conference of the NAACP, et al. v. Hirsch, et al. 720 F. Supp.3d 406 (2024)	Hearsay; improper character evidence	
<b>PX240</b>	2021	Robinson, Mark. 2021. <a href="https://www.youtube.com/watch?v=m23IJSi0_K4">https://www.youtube.com/watch?v=m23IJSi0_K4</a>	Hearsay; authentication	
<b>PX241</b>	1/5/2023	Article-Dukes, Tyler and Connie Brosseau. 2023. "Embattled NC Sheriff Resigns Again Before DA Details Accusations Against Him in Court." The News & Observer	Hearsay	
<b>PX242</b>	11/6/2020	Article- "Candidate Who Made Racist Comment about Black People is Elected to NC School Board." The News and Observer	Hearsay	
<b>PX243</b>	10/8/2020	Article "Rep. Murphy's Now-Deleted Tweet about Sen. Harris Called Racist by N.C. Democrats."	Hearsay	
<b>PX244</b>	9/23/2022	Video- <a href="https://twitter.com/brenonade/status/1573473754453254145?s=20&amp;t=vL6_5ydkUo-w5iviklDi1A">https://twitter.com/brenonade/status/1573473754453254145?s=20&amp;t=vL6_5ydkUo-w5iviklDi1A</a>	Hearsay	
<b>PX245</b>	10/8/2022	Article- "Trump's Flirtation with the N-Word Cannot Be Ignored." The Washington Post	Hearsay	
<b>PX246</b>	10/22/2020	Article- "Madison Cawthorn's Racist Website." The Bulwark	Hearsay	
<b>PX247</b>		Article - "Washington Through and Through"	Hearsay	
<b>PX248</b>	6/28/2018	Article- "God is Racist, Jewish People All Descent from Satan, NC Candidate Says."	Hearsay	
<b>PX249</b>	10/25/2018	Article-"OK Sign or Symbol of White Supremacy? NC GOP Leader under Fire for Instagram Post." News and Observer.	Hearsay	
<b>PX250</b>	1/17/2024	Article- "Neo-Nazi With Felony Convictions Cleared to Remain on GOP Ballot." Vice News.	Hearsay	
<b>PX251</b>	1/10/2024	Online Post- <a href="https://x.com/StephenBWiley/status/1745154461201289538">https://x.com/StephenBWiley/status/1745154461201289538</a> (online post by the caucus director for North Carolina House Republicans referring to Gibson as a "Nazi").	Hearsay; authentication	



PX252	6/3/2022	Article-“North Carolina TV Stations Pull an Attack Ad Against Cheri Beasley, A Democrat Running for Senate.” New York Times	Hearsay	
PX253		Article- “TV Stations Take Down Inflammatory GOP Ad About North Carolina Democratic Senate Candidate Cheri Beasley in Response to Complaints about Inaccuracy.” CBS News.	Hearsay	
PX254		<a href="https://www.youtube.com/watch?v=gipaxeSHoaA">https://www.youtube.com/watch?v=gipaxeSHoaA</a>	Hearsay; authentication	
PX255		NRSC. “NC: Victims.” Available online <a href="https://www.youtube.com/watch?v=TidAbar7E2U">https://www.youtube.com/watch?v=TidAbar7E2U</a> .	Hearsay; authentication	
PX256	11/3/2022	Article- “Fact Check: Campaign Attack Ad Uses Fake Mugshot and the Candidate Wasn’t Convicted.” The Charlotte Observer	Hearsay	
PX257	4/1/2018	Article- “GOP Tries to Connect Candidate to Convicted Murderers	Hearsay	
PX258		“Woke (adj.)”	Hearsay	
PX259	12/5/2022	Article- “What Does Woke Mean? Whatever Ron DeSantis Wants.” Washington Post.	Hearsay	
PX260		Book-The Courage to Be Free: Florida’s Blueprint for America’s Revival. New York: Broadside, 125	Hearsay; authentication	
PX261	1/15/2022	Office of the Governor. 2022. Executive Order Number One	Hearsay	
PX262		Video-“Rep. Ted Budd Address the Bills to Ban Funding for Critical Race Theory.” Charlotte Observer <a href="https://www.charlotteobserver.com/latest-news/article251372578.html">https://www.charlotteobserver.com/latest-news/article251372578.html</a>	Hearsay	
PX263		Brad Briner for Treasurer [Burch FN 132]	Hearsay	
PX264		Video-Bradford for Congress. “Tidy Twins.” <a href="https://www.youtube.com/watch?v=Py6JvcV9vfe">https://www.youtube.com/watch?v=Py6JvcV9vfe</a>	Hearsay; authentication	
PX265	4/26/2022	Specht, Paul. 2022. “Fact Check. Ad says McCrory Appointees ‘Mandated’ Textbooks Pushing Critical Race Theory.”	Hearsay	
PX266	6/28/2018	Article-“North Carolina GOP Primary Winner Says God Is a White Supremacist, Jews Are Satanic.” Newsweek	Hearsay	
PX267	9/8/2024	Medina, Eduardo. 2024. “The Deep Division at the Heart of North Carolina’s Pivotal Governor’s Race.” [FN 54]	Hearsay	
PX268	10/15/2022	“Racist GOP Appeals Heat Up in Final Weeks Before Midterms.” <i>The Washington Post</i>	Hearsay	
PX269		Census Bureau, 2022, Worked Examples for Approximating Standard Errors Using American Community Survey Data	Hearsay	
PX270		North Carolina Manual - State Senate Map - 1985-1992	Hearsay; authentication; best evidence	
PX271	11/22/2024	Supplemental Report of Dr. Traci Burch	Hearsay*	
PX272	10/4/2024	Legislative Defendants' Objections and Responses to Plaintiffs' First Set of Requests for Admission		
PX273	10/4/2024	State Board Defendants' Responses to Plaintiffs' First Set of Requests for Admissions		
PX274	7/5/2024	Legislative Defendants' Objections and Responses to Plaintiffs' First Set of Interrogatories and Requests for Production		

<b>PX275</b>		Census Bureau, Increased Margins of Error in the 5 Year Estimates Containing Data Collected in 2020, ACS Data Users Group		
		All exhibits on any other parties' exhibit list.		