

# EXHIBIT 2

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

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SHAUNA WILLIAMS, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1057

REPRESENTATIVE DESTIN

HALL, etc., et al.,

Case No. 23-CV-1104

Defendants.

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NORTH CAROLINA STATE

CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

PHILIP BERGER, etc., et al.,

Defendants.

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The Remote Deposition of

DEBORAH D. MAXWELL

October 25, 2024

9:30 a.m.

Cynthia Sullivan, RPR

1 APPEARANCES:

2  
3 On behalf of the Plaintiffs:

4 Southern Coalition for Social

5 Justice, by

6 HILARY HARRIS KLEIN, ESQ.

7 1415 West Highway 54

8 Durham, North Carolina 27707

9 hilaryhklein@scsj.org

10  
11 On behalf of the Defendants:

12 Baker & Hostetler, by

13 ERIKA PROUTY, ESQ.

14 200 Civic Center Drive

15 Suite 1200

16 Columbus, Ohio 43215

17 eprouty@bakerlaw.com

18 and

19 Nelson Mullins Riley &

20 Scarborough, by

21 CASSIE A. HOLT, ESQ.

22 301 Hillsborough Street

23 Suite 1400

24 Raleigh, North Carolina 27612

25 cassie.holt@nelsonmullins.com

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1 Q. Can you tell me that the person in  
2 senate district one intends to vote in the 2024  
3 general election?

4 A. I cannot speak for an individual's  
5 voting, but generally people who are members of 13:21:44  
6 this association vote.

7 Q. But you didn't ask any of the  
8 standing members whether they intend to vote in  
9 the 2024 general election, correct?

10 A. That was not a specific question. 13:22:01  
11 It's an implied and an assumed thing being a  
12 member of this organization.

13 Q. Did you verify who the candidates  
14 of choice are for any of the standing members  
15 listed in paragraph 15? 13:22:22

16 A. Could you say that again, please?

17 Q. Did you verify who the candidates  
18 of choice are for the standing members in  
19 paragraph 15?

20 A. Might I venture to say are you 13:22:33  
21 saying do I know who they are going to vote  
22 for?

23 Q. Correct.

24 A. No, ma'am. We are not a partisan  
25 organization. People are free to vote for 13:23:04

1 whoever they choose to. We just educate them  
2 on the basic right that they need to use their  
3 right to vote.

4 Q. You didn't exclude anyone from  
5 paragraph 15 based on who they intend to vote 13:23:17  
6 for in the future, correct?

7 A. No, ma'am.

8 Q. And to confirm, for every standing  
9 member referenced in paragraph 15, did you  
10 verify if they agreed to participate in this 13:23:29  
11 lawsuit?

12 MS. KLEIN: Objection. You can  
13 answer.

14 A. Everyone who is participating has  
15 voluntarily agreed to participate, but I 13:23:42  
16 represent each of them as the state president.

17 Q. Did you verify whether they were  
18 willing to have their names and addresses  
19 disclosed in this lawsuit?

20 A. Only those at the top of the page 13:24:00  
21 which were the named plaintiffs agreed to have  
22 their names and -- entered in the filing of  
23 this lawsuit.

24 Q. Did you ask any of the standing  
25 members referenced in paragraph 15 if they were 13:24:20