

# EXHIBIT 8

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

SHAUNA WILLIAMS, ET AL., )

Plaintiffs, )

VS. )

REPRESENTATIVE DESTIN HALL,            ) Civil Action  
in his official capacity as            ) No. 23 CV 1057  
Chair of the House Standing            )  
Committee on Redistricting,            )  
ET AL.,                                    )

Defendants. )

NORTH CAROLINA STATE )  
CONFERENCE OF THE NAACP, )  
ET AL., )

Plaintiffs, )

VS. )

PHILIP BERGER, in his official) Civil Action  
capacity as the President Pro ) No. 23 CV 1104  
Tempore of the North Carolina )  
Senate, ET AL. )

Defendants. )

VIDEOTAPED DEPOSITION OF BLAKE V. SPRINGHETTI  
Thursday, October 3, 2024

Videotaped Deposition of BLAKE V. SPRINGHETTI, called for examination under the Federal Rules of Civil Procedure, taken before me, the undersigned, Lori Litvin, a Notary Public in and for the State of Ohio, at the offices of Thompson Hine, LLP, Columbus, Ohio, commencing at 9:22 a.m.

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1 ahead.

2 A So it appears this is this talking about race,  
3 and I didn't use race at all in my map drawing. So  
4 for me, I didn't use race, never saw racial data.

5 So for this in my project and my instruction from  
6 the client, no, I -- this doesn't -- wouldn't have  
7 impacted my drawing at all.

8 Q What about communities of interest?

9 A What do you mean by "communities of interest"?

10 Q What does that mean to you?

11 A Subdivisions, local subdivisions.

12 Q Would you consider the Black Belt to be a  
13 community of interest based on this definition and  
14 assuming that this is true?

15 MR. STRACH: Objection. Go  
16 ahead.

17 A I don't really understand what the Black Belt  
18 means, what that definition is. And, again, this is  
19 the first time I have seen this so I can't say whether  
20 or not it would be useful or not.

21 Q Okay. So we talked for a moment about Wake  
22 County and you mentioned that you are not aware of the  
23 demographics in that county.

24 A Correct.

25 Q Do you have any reason to doubt that there's a

Page 30

1 higher black voting age population in Wake County?

2 A I didn't use racial data at all so I wouldn't  
3 know one way or the other.

4 Q Okay. Are you familiar with the Forsyth-Stokes  
5 area?

6 A Geographically, yes.

7 MR. STRACH: Forsyth.

8 MS. MOLODANOF: Forsyth. Thank  
9 you.

10 Q What do you know about the demographics, if  
11 anything?

12 A I don't know anything about the demographics.

13 Q So you do not know anything about the North  
14 Carolina political geography and did not seek to  
15 understand anything about North Carolina political  
16 geography from any legislatures or anybody else during  
17 your map-making process?

18 A Can you say the question again?

19 Q Sure. And I can break it -- break it down. So  
20 you do not have any understanding of North Carolina's  
21 political geography?

22 A Correct.

23 Q And you did not seek out any such information  
24 from any legislatures or anybody else during your  
25 map-making process?

1 capabilities of running an analysis? In this  
2 hypothetical situation that I had all the components  
3 from the client, probably, yes.

4 Q So when you're -- when you're thinking about  
5 redistricting and in your experience, I mean, you're  
6 basically focused on like what has the client asked me  
7 to do, what are the instructions, and that is your  
8 frame of reference for redistricting generally?

9 A Yes.

10 Q Okay. And there's no, really, kind of outside  
11 factors that go into your thinking about how to comply  
12 with, for example, the Voting Rights Act when you're  
13 doing this?

14 A Any -- any foundational work or data or anything  
15 related to any of these projects is driven by the  
16 client.

17 Q And the specific instructions that the client is  
18 giving you?

19 A Correct.

20 Q So, you had mentioned before that you did not  
21 look at racial data when drawing these maps, correct?

22 A Correct.

23 Q And are you aware of anyone else that looked at  
24 racial data who was involved in these maps?

25 A No.