

EXHIBIT 9

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

RODNEY D. PIERCE and MOSES MATTHEWS,)
)
 Plaintiffs,)
 vs.) 4:23-CV-193-D
)
 THE NORTH CAROLINA STATE BOARD OF)
 ELECTIONS, et al.,)
)
 Defendants.)
 _____)

DEPOSITION OF SENATOR RALPH E. HISE, JR.

VOLUME II

TUESDAY, SEPTEMBER 17, 2024

9:03 A.M. to 6:53 P.M.

Taken by the Plaintiffs at:

Nelson Mullins Riley & Scarborough, LLP
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603

Reported by: Sophie Brock, RPR, RMR, RDR, CRR

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

SHAUNA WILLIAMS, et al.,)
)
Plaintiffs,)
vs.) 1:23-CV-1057

REPRESENTATIVE DESTIN HALL, in his)
official capacity as Chair of the)
House Standing Committee on)
Redistricting, et al.)

Defendants.)
_____)

NORTH CAROLINA STATE CONFERENCE OF)
THE NAACP, et al.)

Plaintiffs,)
vs.) 1:23-CV-1104

PHILIP BERGER, in his official)
capacity as the President Pro Tempore)
of the North Carolina Senate, et al.)

Defendants.)
_____)

DEPOSITION OF SENATOR RALPH E. HISE, JR.

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Olivia Molodanof Esq. - Hogan Lovells

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1 forgetting the other gentleman's name.

2 A. Nathan Babcock.

3 Q. Nathan Babcock.

4 What assurances did you have that they
5 weren't looking at concept maps from -- you know,
6 outside the Maptitude system?

7 A. We've done this for many years with them.
8 They've worked many years with me drawing
9 redistricting. I am absolutely certain that they
10 understand that the expectations of the position are
11 that they do not do that. Nothing that they have
12 presented to me indicates that they have done that;
13 and they would no longer be on staff if we had
14 evidence that they had.

15 As y'all are aware, we had the years, two
16 years ago, in the redrawing, where the house had made
17 a decision to present something drawn by someone else
18 to one of the chairs. At that time, before, and post,
19 we have been very clear with them that that would not
20 be acceptable in any process the senate was involved
21 in.

22 Q. What kind of controls did you have to ensure
23 they weren't looking at racial data?

24 A. That the data was not available in any of the
25 computer systems we used.

1 Q. I understand that. Have you ever asked them
2 directly whether, outside the room, they were looking
3 at racial data?

4 A. Following the incident that occurred in the
5 previous depositions, we made it very clear to all
6 staff and others that they once again understood that
7 was not acceptable in the case and was a risk to us
8 within the state, and I'm positive they were aware of
9 that.

10 Q. So let's go -- I'm going to talk to you about
11 the congressional drafts.

12 Do you recall that there were two
13 congressional proposals that came -- that were filed
14 in the senate?

15 A. Yes, we drafted two.

16 Q. Why two proposals?

17 A. We had multiple discussions among the chairs
18 that were not yet resolved about what would be the
19 better map for criteria and partisan considerations
20 for the two maps, as well as the other criteria, and
21 we decided until we had reached that decision, and
22 with the input of the committee, to go ahead and
23 produce both maps as bills.

24 Q. All right. So there was one that was
25 proposed as Senate Bill 756. It was map CBP-5. I can