

# **EXHIBIT 7**

*Excerpts of October 23, 2024, Deposition  
of Calvin C. Jones*

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

~~~~~

SHAUNA WILLIAMS, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1057

REPRESENTATIVE DESTIN

HALL, etc., et al.,

Defendants.

~~~~~

NORTH CAROLINA STATE

CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

Case No. 23-CV-1104

PHILIP BERGER, etc., et al.,

Defendants.

~~~~~

The Remote Deposition of

CALVIN C. JONES

October 23, 2024

2:00 p.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.

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10  
11 On behalf of the Defendants:

12 Baker & Hostetler, by

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18  
19 ALSO PRESENT:

20 Karen Patterson, Veritext

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1           A.       Yes.

2           Q.       Where did you graduate from?

3           A.       When I started it was North  
4   Carolina College, but when I finished it was  
5   North Carolina Central in Durham.

6           Q.       What degree did you earn from that  
7   university?

8           A.       A degree in political science.

9           Q.       Are you a member of any  
10   organizations in North Carolina?

11                   MS. KLEIN:  Objection.  We made an  
12   objection to this question in our discovery  
13   responses with the exception of limited  
14   membership, so I'll just instruct the witness  
15   that we have objected on First Amendment  
16   grounds.  But to the extent that you are able  
17   to answer without it chilling First Amendment  
18   associations that you have, you can answer the  
19   question, and I'm happy to step out to explain  
20   the privilege instruction if needed, Mr. Jones.

21           A.       When you say other organizations,  
22   are you talking about any organization, or do  
23   you have something specific in mind?

24           Q.       Any organizations.

25           A.       I am.

1 Q. What organizations are those?

2 A. I may not give you all of them, I  
3 may not remember all of them, but I'm in  
4 several organizations. I'm a member of the  
5 Franklin County Sunday School and Baptist  
6 Training Unity Convention, Incorporated.

7 Q. Any others?

8 A. I'm a member of the NAACP.

9 Q. Are there other organizations that  
10 you are not identifying in response to my  
11 question based on your attorney's instruction  
12 based on the First Amendment privilege?

13 A. There are not. I didn't think to  
14 write a list of them down, and I'm just trying  
15 to recall some of them that I am in.

16 Q. Okay.

17 A. That's not all of them.

18 Q. Okay.

19 A. Let me -- I'll give you another  
20 one. I'm a member of the Alliance of Black  
21 Elected Officials.

22 Q. Just to clarify --

23 A. I'm a member of an organization  
24 that's present in my old elementary school,  
25 tech school elementary school, Memorial Forest

1 Educational Council.

2 Q. Are there any other organizations  
3 that you can think of?

4 A. Right now that's probably what I  
5 can think of, but I don't have any problem  
6 sharing them with you if you need them.

7 Q. Okay. If you recall some of them  
8 throughout the deposition today, like something  
9 jogs your memory, just let me know. But just  
10 to be clear, you are not refusing to identify  
11 any of those organizations based on the First  
12 Amendment privilege; is that right?

13 A. That's correct.

14 Q. I think I heard you say you were a  
15 member of the NAACP; is that correct?

16 A. That's correct.

17 Q. Are you a member of a specific  
18 chapter of the NAACP?

19 A. Yes. Warren County has a chapter.

20 Q. Okay. How long have you been a  
21 member of the Warren County chapter of the  
22 NAACP?

23 A. Several years. I'm a lifetime  
24 member of the organization itself.

25 Q. When did you become a lifetime



1 member of the NAACP?

2 A. It's probably been about two, maybe  
3 three years. As you can see, I don't  
4 necessarily keep up with all those dates.

5 Q. Why did you decide to become a  
6 lifetime member of the NAACP?

7 A. I decided to become a lifetime  
8 member from the standpoint of giving back.  
9 There have been others who have come before me  
10 who died with blood, sweat, and tears to give  
11 me the opportunity to be where I am, so at a  
12 minimum the least I can do is give back.

13 Q. Were you an annual member prior to  
14 becoming a lifetime member?

15 A. Yes.

16 Q. When did you become an annual  
17 member of the NAACP?

18 A. I don't have those records, either.

19 Q. Can you give me your best guess,  
20 was it five years ago? Was it ten years ago?  
21 Was it 20?

22 A. It was not ten. I know that.

23 Q. Okay.

24 A. I would put it in the neighborhood  
25 of five, but not ten.

1           Q.       Okay. What types of activities do  
2 you engage in with the NAACP?

3           A.       Right now I'm the treasurer of that  
4 local chapter.

5           Q.       When did you become the treasurer?

6           A.       Last year.

7           Q.       Why did you decide to become the  
8 treasurer?

9           A.       I guess my best answer would be it  
10 is that I'm just willing to give back, so I  
11 give of myself, too much almost.

12          Q.       Do you attend meetings of the  
13 NAACP?

14          A.       Yes.

15          Q.       How often do you attend meetings of  
16 the NAACP?

17          A.       The NAACP meets monthly. On  
18 occasion I do have to miss for other reasons,  
19 but I typically try to attend regularly.

20          Q.       Do you attend any other activities  
21 sponsored by the NAACP?

22          A.       Yes.

23          Q.       What types of activities?

24          A.       Actually, we just had an annual  
25 banquet two weeks ago.

1           Q.       What was the purpose of that  
2 banquet?

3           A.       The purpose of that banquet was a  
4 fundraiser.

5           Q.       Do you attend any other activities  
6 or events sponsored by the NAACP?

7           A.       I do.

8           Q.       Can you share some of those?

9           A.       There are some committees that I  
10 meet with, and I'm an executive board member,  
11 so it meets monthly as well in addition to the  
12 regular meeting.

13          Q.       When you say you're an executive  
14 board member, is that through your role as the  
15 treasurer of the Warren County chapter?

16          A.       That is correct.

17          Q.       Okay. Have you ever been elected  
18 to public office?

19          A.       I have.

20          Q.       What offices have you been elected  
21 to?

22          A.       A school board member in Warren  
23 County.

24          Q.       Are you currently a school board  
25 member?

REPORTER'S CERTIFICATE

The State of Ohio, )

SS:

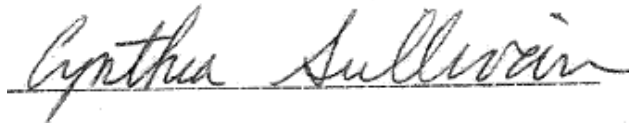
County of Cuyahoga. )

I, Cynthia Sullivan, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, CALVIN C. JONES, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

1 I do further certify that I am not  
2 a relative, counsel or attorney for either  
3 party, or otherwise interested in the event of  
4 this action.

5 IN WITNESS WHEREOF, I have hereunto  
6 set my hand and affixed my seal of office at  
7 Cleveland, Ohio, on this 5th day of  
8 November, 2024.

9  
10  
11  
12 

13 -----  
14 Cynthia Sullivan, Notary Public  
15 within and for the State of Ohio

16  
17 My commission expires October 17, 2026.  
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