

## **EXHIBIT 12**

*Excerpts of October 24, 2024, Deposition  
of John R. Alford, Ph.D.*

1 UNITED STATES DISTRICT COURT  
2 MIDDLE DISTRICT OF NORTH CAROLINA  
3

4 SHAUNA WILLIAMS, et al., )  
5 Plaintiffs, )  
6 v. ) Civil Action No.  
7 REPRESENTATIVE DESTIN HALL, ) 23 CV 1057  
8 in his official capacity as )  
9 Chair of the House Standing )  
10 Committee on )  
11 Redistricting, et al., )  
12 Defendants. )

13 \_\_\_\_\_ )  
14 NORTH CAROLINA STATE CONFERENCE )  
15 OF THE NAACP, et al., )  
16 Plaintiffs, )  
17 v. ) Civil Action No.  
18 PHILIP BERGER, in his official ) 23 CV 1104  
19 capacity as the President )  
20 Pro Tempore of the )  
21 North Carolina Senate, et al., )  
22 Defendants. )  
23 \_\_\_\_\_ )

24 VIDEOCONFERENCE DEPOSITION OF JOHN R. ALFORD, Ph.D.  
25 (Taken by Plaintiffs)

Via Zoom Videoconference  
Thursday, October 24, 2024

Reported in Stenotype by  
Diane Pressley, Shorthand Reporter  
Transcript produced by computer-aided transcription  
JOB No. 6972602

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1 VIDEOCONFERENCE DEPOSITION OF JOHN R. ALFORD, Ph.D.,  
2 a witness called to testify, before Diane Pressley,  
3 Notary Public, in and for the State of North Carolina,  
4 located in Wake County, all parties appearing via Zoom  
5 videoconference, held on Thursday, October 24, 2024,  
6 commencing at 9:38 a.m.

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1 Senate Districts 2 and 5. Do you see those right  
2 there?

3 A. Yes. Would this be a good time for a  
4 break?

5 Q. Yeah, absolutely. We can take a break.

6 (Recess was taken from 11:25 p.m. to 11:37  
7 a.m.)

8 BY MS. KLEIN:

9 Q. Thank you, Dr. Alford. We're going to go  
10 back to Exhibit 3, what's been marked as Exhibit 3,  
11 this is the Oskooii report. And we're on page 33 of  
12 that. And you see in Figure 12 he's showing the  
13 boundaries of the demonstrative plan, correct?

14 A. Yes, that's what it says.

15 Q. And you're not being offered as an expert  
16 on Gingles 1 in this matter, correct?

17 A. Not to my knowledge.

18 Q. And Figure 13 -- actually, we'll stick with  
19 the RxC.

20 Actually for the purposes of this we'll  
21 just use the iterative EI here, because I think he  
22 actually does not -- he includes in his appendices  
23 the RxC.

24 But you can see pretty high levels of black  
25 cohesion within these two districts, correct?

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1 A. That's correct.

2 Q. So are you disputing that these levels and  
3 those in the Oskooii appendices show black cohesion  
4 and satisfaction of Gingles 2?

5 A. No.

6 Q. Are you disputing the satisfaction of  
7 Gingles 2 for any of the house districts?

8 A. Gingles 2 for the house districts?

9 Q. House demonstrative districts. And I can  
10 go back if it's helpful.

11 A. I don't think I am. I can't imagine that  
12 there's a house district drawn in a way that would  
13 not have cohesive black support for democratic  
14 candidates.

15 Q. Okay. And what about any of the  
16 congressional districts, are you disputing black  
17 cohesion in satisfaction of Gingles 2 in any of the  
18 congressional districts?

19 A. No.

20 Q. All right. Let's skip down to the  
21 performance results part of Dr. Oskooii's report,  
22 this is page 36 of table 3. Do you see that on the  
23 screen?

24 A. I do.

25 Q. Do you agree that performance analysis is

REPORTER'S CERTIFICATE

I, Diane Pressley, Court Reporter do hereby certify that the above-named witness was not duly sworn by me prior to the taking of the foregoing deposition; and that said deposition was taken and transcribed under my supervision, to the best of my ability; and that the foregoing pages, inclusive, constitute a true and accurate transcription of the testimony of the witness.

I do further certify that the persons were present as stated in the caption.

I do further certify that I am not of counsel for or in the employment of any of the parties to this action, nor am I interested in the results of this action.



DIANE PRESSLEY

COURT REPORTER