

EXHIBIT 4

*Third Declaration of Deborah Dicks
Maxwell, President of the North Carolina
State Conference of the NAACP, dated
January 7, 2025*

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 23 CV 1057

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

Plaintiffs,

v.

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

Defendants.

Civil Action No. 23 CV 1104

**THIRD DECLARATION OF DEBORAH DICKS MAXWELL
PRESIDENT OF THE NORTH CAROLINA STATE
CONFERENCE OF THE NAACP**

I, Deborah Dicks Maxwell, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I previously provided declarations on September 23, 2024, and October 2, 2024, in this matter.
2. I am aware that pursuant to a Court order my counsel has since produced the unredacted voting records for those members of the North Carolina NAACP who live in the areas we are challenging in this matter and who provide standing for the North Carolina NAACP to bring its claims in this matter, and that those records were produced with bates numbers NAACPPS_0005644–5718.¹
3. The North Carolina NAACP received the permission of every individual whose voting records were produced to provide these records on a confidential, non-public basis to counsel for the Defendants and under seal to the Court.
4. As of the date of this declaration, I have confirmed that each individual in the unredacted voting records we produced is a current, active member of the North Carolina NAACP and has been since we filed the Complaint in this matter on December 19, 2023. To become a member of the North Carolina NAACP, an individual submits a membership application to their local branch of the NAACP. Once an individual becomes a member of a local branch of the North Carolina NAACP, they are also a member of the state chapter and the national NAACP. Membership dues are paid to the local branch, or directly to the national NAACP.
5. I verified the active membership status of each individual utilizing the database of members maintained by the national NAACP, which I and other members of my North Carolina leadership team are able to access to see members of all local North Carolina branches through a password protected online portal. This database contains the information provided by each member when they submit a membership application to their local branch of the NAACP, including their name, address, email, and membership level. The database

¹ The individual at bates NAACPPS_0005640–43 had her annual dues up for repayment in December 2024, and I was unable to confirm with this individual they are merely delayed in their payment or intend to discontinue membership. I have therefore omitted their record from this bates range. The North Carolina NAACP has identified other individuals in the same districts of the state, such as at NAACPPS_0005678–5681.

also indicates when an individual first became a member and whether a member has become “inactive” because they have not paid their membership dues.

6. The individuals whose voting records are within the following bates ranges have been lifetime members of the North Carolina NAACP since before the filing of the Complaint in December of 2023:
 - a. NAACPPS_0005653–5656;
 - b. NAACPPS_0005644–5647;
 - c. NAACPPS_0005696–5700;
 - d. NAACPPS_0005648–5652;
 - e. NAACPPS_0005701–5705;
 - f. NAACPPS_0005657–5660;
 - g. NAACPPS_0005706–5709;
 - h. NAACPPS_0005665–5669;
 - i. NAACPPS_0005710–5714;
 - j. NAACPPS_0005674–5677;
 - k. NAACPPS_0005678–5681;
 - l. NAACPPS_0005682–5686;
7. The individuals whose voting records are within the following bates ranges are and have been annual members since before the filing of the Complaint in December of 2023.
 - a. NAACPPS_0005661–5664;
 - b. NAACPPS_0005670–5673;
 - c. NAACPPS_0005715–5718;
 - d. NAACPPS_0005687–5691; and
 - e. NAACPPS_0005692–5695.
8. I also verified that each individual within the voting records produced is still registered to vote at the same address as in the produced voting records, using the North Carolina State Board’s voter registration records, available at <https://vt.ncsbe.gov/reglkup/>. I was also able to confirm that they voted in the 2024 general election. Finally, the State Board’s voter registration records confirm that each individual identifies as Black or African American.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: 1/7/2025


Deborah Dicks Maxwell