

## **EXHIBIT 6**

*Excerpts of November 4, 2024,  
Deposition of Dawn Daly-Mack*

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

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SHAUNA WILLIAMS, et al.,  
Plaintiffs,

vs. Case No. 23-CV-1057

REPRESENTATIVE DESTIN  
HALL, etc., et al.,  
Defendants.

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

vs. Case No. 23-CV-1104

PHILIP BERGER, etc., et al.,  
Defendants.

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Deposition of  
DAWN DALY-MACK

Monday, November 4, 2024

1:01 p.m.

Taken via videoconference

Genevie Del Valle, Court Reporter

1 APPEARANCES:

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W I T N E S S I N D E X

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EXAMINATION

DAWN DALY-MACK

BY MR. LEWIS

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EXAMINATION

DAWN DALY-MACK

BY MS. KLEIN

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EXHIBIT

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Daly-Mack

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HOLD: Community Meeting on Maps

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Exhibit 6 (retained by counsel)

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1           And, Reverend, what is your -- what is your  
2           race?

3           A.   African American.

4           Q.   Have you ever been to -- a party to a lawsuit  
5           before this one?

6           A.   No.

7           Q.   Have you ever testified as a witness in a case?

8           A.   No.

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

11                       MS. KLEIN:  Objection.  We made  
12                       First Amendment objections regarding any  
13                       affiliations on the basis of the First  
14                       Amendment because -- where disclosure of  
15                       that information is not directly related to  
16                       the lawsuit and would have a chilling  
17                       effect, but I will instruct the witness to  
18                       answer any questions about her affiliations  
19                       to the extent she believes disclosing that  
20                       information would not have a chilling  
21                       effect on her ability to associate with  
22                       those organizations.

23                       So I'll instruct the witness that  
24                       way and say if you want more explanation,  
25                       we can go off the record briefly, but,

1 otherwise, I'll let her answer.

2 A. So what was that question again?

3 Q. Are you a member of any political organizations  
4 in North Carolina?

5 MS. KLEIN: Same objection and  
6 instruction.

7 You can go ahead.

8 A. I'm a registered democrat. I mean, is that what  
9 you mean?

10 Q. So you're a registered democrat.

11 Are you a member of any -- how about any  
12 public policy organizations?

13 A. No.

14 Q. Now, you're obviously a member of the NAACP,  
15 right?

16 A. Yes.

17 Q. And how would you characterize the NAACP?

18 A. A civil rights organization.

19 Q. Are you a member of any civil rights  
20 organizations, other than the NAACP?

21 A. No.

22 Q. Are there any groups that you would have -- that  
23 you would have identified in response to my  
24 preceding three questions that you didn't because  
25 of concerns about retaliation?

1 A. No.

2 Q. And so how long -- we'll just talk very, very  
3 briefly about your role at the NAACP, but how  
4 long have you been a member of -- well, first of  
5 all, what branch or unit of the NAACP are you a  
6 member of?

7 A. Northampton County branch.

8 Q. And how long have you been a member of that  
9 group?

10 A. I would say about six years.

11 Q. How did you become a member?

12 A. Well, you ready for this long answer? I was a  
13 caretaker for my sick husband for about 12 years,  
14 and after he died, I said, what do I do with my  
15 time now? And so I looked around my community to  
16 see if there was anything I could do, any place I  
17 could be helpful to my community, and I joined  
18 the -- well, I first just attended a meeting and  
19 found a wonderful place to learn everything I  
20 ever wanted to know about my county right there,  
21 and then I joined.

22 Q. And so you did that -- so about six years ago,  
23 did I hear that right?

24 A. Yes.

25 Q. And are you a lifetime member or an annual member

1 of your branch?

2 A. Well, I am happy to say that after next month's  
3 last payment, I will be a lifetime member.

4 Q. And you actually -- you are currently the  
5 president of that branch; is that right?

6 A. I am.

7 Q. And when did you become the president?

8 A. Well, I just finished serving my first two-year  
9 term and looking forward to being elected for my  
10 second two-year term.

11 Q. Does that election happen, like, relatively soon  
12 or?

13 A. Yes, the end of this month.

14 Q. And were you an officer in your -- in the chapter  
15 before becoming president, like some other  
16 officer role?

17 A. No.

18 Q. And is that a paid or a volunteer role?

19 A. Volunteer.

20 Q. That's great.

21 Have you ever been elected to public office?

22 A. No.

23 Q. Never been a -- oh, sorry.

24 A. Not interested.

25 Q. I'll ask the next question because I have to:



C E R T I F I C A T E

The State of Ohio, ) SS:  
County of Cuyahoga.)

I, Genevie del Valle, a Notary Public within and for the State of Ohio, authorized to administer oaths and to take and certify depositions, do hereby certify that the above-named witness was by me, before the giving of their deposition, first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the deposition as above-set forth was reduced to writing by me by means of stenotypy, and was later transcribed into typewriting under my direction; that this is a true record of the testimony given by the witness; that the deponent or a party requested that the deposition be reviewed by the deponent; that said deposition was taken at the aforementioned time, date and place, pursuant to notice or stipulations of counsel; that I am not a relative or employee or attorney of any of the parties, or a relative or employee of such attorney or financially interested in this action.

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



Genevie del Valle  
Notary Public, State of Ohio  
My commission expires September 28, 2028