

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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.

Case No. 1:23-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.

**WILLIAMS PLAINTIFF SHAUNA WILLIAMS'S RESPONSE TO LEGISLATIVE
DEFENDANTS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Shauna Williams, by and through her attorneys, submits the following written objections and responses to Legislative Defendants' First Set of Interrogatories served on June 11, 2024.

INTERROGATORY NO. 2:

State whether you or any organization of which you are a member has drawn or created any alternative maps to the 2023 Plans. If you have drawn or created such maps, identify each individual involved in the development of each map you created, the software used to draw or create each map, and describe the criteria you or your organization used to draw or create each map.

RESPONSE:

Ms. Williams objects to this interrogatory because it seeks information that is neither relevant to her claims nor proportional to the needs of the case.

Subject to and without waiving the objections above, Ms. Williams responds that she has not drawn or created any alternative maps to the 2023 Plans, nor does she have knowledge of any organization of which she is a member having drawn or created any such alternative maps.

INTERROGATORY NO. 3:

Identify each district in the 2023 Congressional Plan you are challenging for each of your claims in the Complaint under the Fourteenth Amendment to the U.S. Constitution (Count I), the Fourteenth and Fifteenth Amendments to the U.S. Constitution (Count II), and Section 2 of the Voting Rights Act (Count III).

RESPONSE:

With respect to Count I, Ms. Williams challenges Congressional District 1. With respect to Counts II and III, Ms. Williams challenges the entire 2023 Congressional Plan.

Dated: July 11, 2024

By: /s/ Abha Khanna

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** Special Appearance pursuant to
Local Rule 83.1(d)*

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2024, the foregoing document was served via e-mail on all counsel of record for Defendants and Consolidated Plaintiffs.

/s/ Jyoti Jasrasaria