

# Attachment 10

**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.*

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

**Supplemental Expert Report of Andrew Taylor, Ph.D.**

This supplemental report contains a small number of revisions in the form of updates to the initial expert report I wrote in this case and that was submitted on September 26, 2024.

I. I have now testified at the trial of a related case, *Pierce v. NCSBE* that was argued in front of the U.S. District Court for the Eastern District of North Carolina from February 3 to February 7, 2025. My testimony was on February 6-7.

II. In Section V p.30 of the report, I cite figures for the proportion of members of the North Carolina General Assembly who are Black. The report was written prior to the 2024 election and that proportion has increased. According to the House Principal Clerk's Office and the Senate Principal Clerk's Office, 38 members of the legislature or 22.35 percent are Black (28 House members and 10 Senators).<sup>1</sup>

III. In Section VIII pp. 38-40 of the report, I present figures on the 2020 presidential election in North Carolina. We have, of course, experienced another presidential election since I wrote. About 140,000 more North Carolinians—for a total of nearly 2.9 million—voted for Donald Trump in 2024 than 2020. The North Carolina State Board of Elections (NCSBE) reports he won that state by about 2.1 percentage points more than he did in 2020.<sup>2</sup> Exit polls report the national Black vote for Trump increased by four percentage points from

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<sup>1</sup> The House figure is calculated from data at: <https://webservices.ncleg.gov/ViewDocSiteFile/91593>. The Senate figure is calculated from data at: <https://webservices.ncleg.gov/ViewDocSiteFile/91583>.

<sup>2</sup> See election results at NCSBE's website: <https://www.ncsbe.gov/results-data/election-results>.

2020 to 16 percent.<sup>3</sup> Trump won a larger proportion of the vote in 25 states than he did North Carolina in 2024. The figure was 24 in 2020.

IV. I attach an updated version of my vita as Appendix A.

Date: 3/17/25

I, Dr. Andrew Taylor, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, hereby declare that the foregoing is true and accurate to the best of my knowledge.



A handwritten signature, appearing to read "A. Taylor", is written over a horizontal line.

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<sup>3</sup> The AP VoteCast exit poll data are reported at: <https://apnews.com/projects/election-results-2024/votecast>.