

**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

**DECLARATION OF HILARY HARRIS KLEIN IN SUPPORT OF NAACP
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

October 31, 2025

I, Hilary Harris Klein, hereby declare:

1. All facts set forth herein are based on my personal knowledge, and if called upon to testify as to the contents of this Declaration, I could and would do so.

2. I am Senior Counsel for Voting Rights at Southern Coalition for Social Justice and counsel for NAACP Plaintiffs in this matter.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the bill summary page for Senate Bill 249 / S.L. 2025-95, available on the North Carolina General Assembly's website at <https://www.ncleg.gov/BillLookUp/2025/S249>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the version of Senate Bill 249 filed on March 6, 2025, available on the North Carolina General Assembly's website at <https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S249v0.pdf> and titled "AN ACT TO EXEMPT OTHER POLITICAL PARTY GROUPS IN THIS STATE FROM CAMPAIGN SALES REPORTING REQUIREMENTS FOR THE PURCHASE PRICE OF GOODS OR SERVICES UNDER THE CAMPAIGN FINANCE LAWS."

5. Attached hereto as **Exhibit 3** is a true and correct copy of the First Edition of Senate Bill 249 with the same title as in Exhibit 5 and dated March 10, 2025, available on the North Carolina General Assembly's website at <https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S249v1.pdf>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the October 13, 2025 press release titled *General Assembly Heeds President Trump's Call to Thwart Blue State Attempts to Take Congress*, issued by Senator Phil Berger and available at

<https://bergerpress.medium.com/general-assembly-heeds-president-trumps-call-to-thwart-blue-state-attempts-to-take-congress-4cecd10f5582>.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the October 16, 2025 press release titled *Public Comment Period Open for Proposed Congressional Map*, issued by Senator Phil Berger and available at <https://bergerpress.medium.com/public-comment-period-open-for-proposed-congressional-map-bbc2c3818816>.

8. Attached hereto as **Exhibit 6** is a true and correct copy of an email received from EmailSubscriptions@ncleg.gov on October 16, 2025 at 3:56pm, providing notice that the Senate Committee on Elections would meet on Monday, October 20, 2025 to “consider and vote on the 2025 Congressional map.”

9. Attached hereto as **Exhibit 7** is a true and correct copy of an email received from EmailSubscriptions@ncleg.gov on October 19, 2025 at 3:36pm, adding SB249 to the agenda for the October 20, 2025 meeting of the Senate Committee on Elections.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Senate Elections Committee Substitute of SB249, adopted by the committee on October 20, 2025 and available on the North Carolina General Assembly’s website at <https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S249v2.pdf>.

11. Attached hereto as **Exhibit 9** is a true and correct copy of the published 2025 Congressional Plan Criteria, available on the North Carolina General Assembly’s website at <https://webservices.ncleg.gov/ViewDocSiteFile/101156>.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the audio recording of the October 20, 2025 meeting of the North Carolina Senate Elections

Committee, available on the North Carolina General Assembly's website at

<https://webservices.ncleg.gov/ViewDocSiteFile/101162>.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the audio recording from the North Carolina Senate Chamber on October 20, 2025, available on the North Carolina General Assembly's website at

<https://webservices.ncleg.gov/ViewDocSiteFile/101211>.

14. Attached hereto as **Exhibit 12** is a true and correct copy of Amendment A3, filed by Senator Mujtaba A. Mohammed and brought to the North Carolina Senate floor on October 20, 2025, available on the North Carolina General Assembly's website at

<https://webservices.ncleg.gov/ViewBillDocument/2025/7602/0/S249-AST-34-V-3>.

15. Attached hereto as **Exhibit 13** is a true and correct copy of the audio recording from the North Carolina Senate Chamber on October 21, 2025, available on the North Carolina General Assembly's website at

<https://webservices.ncleg.gov/ViewDocSiteFile/101212>.

16. Attached hereto as **Exhibit 14** is a true and correct copy of Amendment A6, filed by Senator Michael Garrett and brought to the North Carolina Senate floor on October 21, 2025, available on the North Carolina General Assembly's website at

<https://webservices.ncleg.gov/ViewBillDocument/2025/7618/0/S249-A-NBC-16991>.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the audio recording of the October 21, 2025 meeting of the North Carolina House Select Committee on Redistricting, available on the North Carolina General Assembly's website

at <https://webservices.ncleg.gov/ViewDocSiteFile/101177>.

18. Attached hereto as **Exhibit 16** is a true and correct copy of the audio recording of the October 21, 2025 meeting of the North Carolina House Committee on Rules, Calendar, and Operations, available on the North Carolina General Assembly's website at <https://webservices.ncleg.gov/ViewDocSiteFile/101221>.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the audio recording from the North Carolina House Chamber on October 22, 2025, available on the North Carolina General Assembly's website at <https://webservices.ncleg.gov/ViewDocSiteFile/101215>.

20. Attached hereto as **Exhibit 18** is a true and correct copy of Session Law 2025-95, available on the North Carolina General Assembly's website at <https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S249v4.pdf>.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the "StatPack" published by the North Carolina General Assembly for Session Law 2025-95, available at <https://webservices.ncleg.gov/ViewBillDocument/2025/7665/0/SL%202025-95%20-%20StatPack%20Report>.

22. Attached hereto as **Exhibit 20** is a true and correct copy of a New York Times article dated July 4, 1967, titled *North Carolina Revises 11 Congressional Districts*, and available at <https://www.nytimes.com/1967/07/04/archives/north-carolina-revises-11-congressional-districts.html>.

23. Attached hereto as **Exhibit 21** is a true and correct copy of an October 24, 2025 article by Kyle Ingram titled *12,000 comments poured in on NC's new Trump-*

backed map. And they weren't positive, published by The News & Observer and available at <https://www.newsobserver.com/news/politics-government/article312614750.html>.

24. Attached hereto as **Exhibit 22** is a true and correct copy of an October 28, 2025 article by Christa Dutton titled *Rep. Don Davis Says He Won't Go Down Without a Fight*, published by The Assembly and available at <https://www.theassemblync.com/politics/don-davis-1st-congressional-district/>.

25. Attached hereto as **Exhibit 23** is a true and correct copy of the November 5, 2024 Official General Election Results for Wilson County, published by the North Carolina State Board of Elections and available at https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=98&office=ALL&contest=0.

26. Attached hereto as **Exhibit 24** is a true and correct copy of the November 5, 2024 Official General Election Results for Lenoir County, published by the North Carolina State Board of Elections and available at https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=54&office=ALL&contest=0.

27. Attached hereto as **Exhibit 25** is a true and correct copy of the map of North Carolina's Congressional Districts following their amendment in SB249, available on the North Carolina General Assembly's website at <https://webservices.ncleg.gov/ViewBillDocument/2025/7663/0/SL%202025-95%20-%2011%20x%2017%20Map>.

28. Attached hereto as **Exhibit 26** is a true and correct copy of the maps of North Carolina's Congressional Districts used in any election since 1992, available on the

North Carolina General Assembly's website, ncleg.gov/redistricting, under "District Plans Enacted or Ordered by the Court" and "Congressional."

29. Attached hereto as **Exhibit 27** is a document produced by Opinion Diagnostics detailing the results of a survey of North Carolina voters fielded on September 15-17, 2025 for Common Cause North Carolina, available at <https://www.commoncause.org/north-carolina/wp-content/uploads/2025/10/2025-NC-Redistricting-Poll.pdf>.

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

Executed on: October 31, 2025



Hilary Harris Klein

CERTIFICATE OF SERVICE

I certify that on October 31, 2025, I electronically filed the foregoing and its exhibits with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Hilary Harris Klein
Hilary Harris Klein