

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.

Civil Action No. 23-CV-1104

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

Defendants.

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1), *Williams* Plaintiffs, *NAACP* Plaintiffs, Legislative Defendants, and State Board Defendants (“Parties”), by and through undersigned counsel, hereby stipulate that Plaintiffs’ remaining claims in their Supplemental Complaint [D.E.s 180, 181] regarding the 2025 Congressional Plan, 2025 N.C. Sess. Laws 95, and in their First Amended Complaint and Second Amended Complaint relating to Congressional District 1 [D.E.s 105, 108], in these consolidated actions shall be dismissed with prejudice. The Parties further stipulate that each party shall bear their own fees and costs as to the Supplemental Complaints’ claims regarding the 2025 Congressional Plan only.

Nothing in this stipulation affects claims previously adjudicated by this Court to final judgment as set forth in the Court’s November 20, 2025 Memorandum Opinion and Order and Judgment [D.E.s 209, 210], the fees and costs of which are being resolved by an agreement among the Parties whereby *NAACP* Plaintiffs and *Williams* Plaintiffs will each make a payment of costs to Legislative Defendants no later than 30 days after the filing of this stipulation. The Parties hereby agree that nothing shall prevent Legislative Defendants from seeking costs, including costs above the agreed upon amount, in the event that the payments are not received within 30 days of the filing of this stipulation.

Respectfully submitted January 16, 2025.

**SOUTHERN COALITION FOR
SOCIAL JUSTICE**

By: /s/ Hilary Harris Klein

Hilary Harris Klein (State Bar #53711)
Jeffrey Loperfido (State Bar #52939)
Christopher Shenton (State Bar #60442)
Lily Talerman (State Bar #61131)
5517 Durham Chapel Hill Blvd.
Durham, NC 27707
Telephone: 919-794-4213
Facsimile: 919-908-1525
hilaryhklein@scsj.org
jeffloperfido@scsj.org
chrisshenton@scsj.org
lily@scsj.org

HOGAN LOVELLS US LLP

J. Tom Boer*

Olivia Molodanof*

Madeleine Bech*

4 Embarcadero Center, Suite 3500

San Francisco, CA 94111

Telephone: 415-374-2300

Facsimile: 415-374-2499

tom.boer@hoganlovells.com

olivia.molodanof@hoganlovells.com

madeleine.bech@hogenlovells.com

Jessica L. Ellsworth*

Misty Howell*

Odunayo Durojaye*

555 Thirteenth Street, NW

Washington, DC 20004

Telephone: 202-637-5600

Facsimile: 202-637-5910

jessica.ellsworth@hoganlovells.com

misty.howell@hogenlovells.com

odunayo.durojaye@hogenlovells.com

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: /s/ Phillip J. Strach

Phillip J. Strach
North Carolina State Bar No. 29456
Alyssa M. Riggins
North Carolina State Bar No. 52366
Cassie A. Holt
North Carolina State Bar No. 56505
Jordan A. Koonts
North Carolina State Bar No. 59363
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Ph: (919) 329-3800
phil.strach@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com
jordan.koonts@nelsonmullins.com

BAKER & HOSTETLER LLP

Richard B. Raile*

DC Bar No. 1015689

Katherine L. McKnight*

DC Bar No. 994456

Trevor Stanley*

DC Bar No. 991207

1050 Connecticut Ave. NW

Suite 1100

Washington, DC 20036

Ph: (202) 861-1500

rraile@bakerlaw.com

kmcknight@bakerlaw.com

tstanley@bakerlaw.com

Patrick T. Lewis*

Ohio State Bar No. 0078314

Key Tower

127 Public Square, Suite 2000

Cleveland, Ohio 44114

ACLU FOUNDATION

Ari J. Savitzky**
Ethan Herenstein**
Clayton Pierce**
Sophia Lin Lakin**
125 Broad Street, 18th Floor
New York, New York 10004
(212) 549-2500
asavitzky@aclu.org
eherenstein@aclu.org
cpierce@aclu.org
slakin@aclu.org

***Applications to appear specially
forthcoming*

ACLU OF NORTH CAROLINA LEGAL FOUNDATION

Jaclyn Maffetore (State Bar #50849)
Kristi L. Graunke (State Bar #51216)
P.O. Box 28004
Raleigh, NC 27611
(919) 354-5070
jmaffetore@acluofnc.org
kraunke@acluofnc.org

Counsel for NAACP Plaintiffs

PATTERSON HARKAVY LLP

By: /s/ Narendra K. Gosh
Narendra K. Gosh, NC Bar No. 37649
100 Europa Drive, Suite 420
Chapel Hill, NC 27517
Phone: (919) 942-5200
nghosh@pathlaw.com

ELIAS LAW GROUP LLP

By: /s/ Lalitha D. Madduri

Ph: (216) 621-0200
plewis@bakerlaw.com

Erika D. Prouty*
Ohio State Bar No. 0095821
Anna Croysts*
Ohio State Bar No. 0104620
200 Civic Center Drive, Suite 1200
Columbus, Ohio 43215
Ph: (614) 462-4710
eprouty@bakerlaw.com
acroysts@bakerlaw.com

** Appeared via Special Notice
Attorneys for Legislative Defendants*

NORTH CAROLINA DEPARTMENT OF JUSTICE

By: /s/ Mary L. Lucasse

Terence Steed
Special Deputy Attorney General
N.C. State Bar No. 52809
tsteed@ncdoj.gov

Mary L. Lucasse
Special Deputy Attorney General

Lalitha D. Madduri*
Lucas Lallinger*
Qizhou Ge*
James J. Pinchak*
250 Massachusetts Avenue, Suite 400
Washington, D.C. 20001
Phone: (202) 968-4490
Facsimile: (202) 968-4498
LMadduri@elias.law
LLallinger@elias.law
AGe@elias.law
JPinchak@elias.law

N.C. State Bar No. 39153
mlucasse@ncdoj.gov
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 2760200629
Telephone: (919) 716-6567
Facsimile: (919) 716-6761

Counsel for State Defendants

Abha Khanna*
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
AKhanna@elias.law

Counsel for Williams Plaintiffs

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