

Exhibit 11

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<p style="text-align: right;">Page 2</p> <p>1 TAKEN BY: Counsel for Thomas Alexander and Luke Rankin</p> <p>2</p> <p>3 REPORTED BY: Elaine L. Grove-DeFreitas, Independent Professional Reporter (Via Videoconference)</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2</p> <p>3 ATTORNEYS FOR THE HOUSE DEFENDANTS:</p> <p>4 NEXSEN PRUET, LLC BY: JENNIFER HOLLINGSWORTH BY: HAMILTON BARBER 1230 Main Street Suite 700 Columbia, South Carolina 29201 803-771-8900 hbarber@nexsenpruet.com (Via Videoconference)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 ATTORNEYS FOR ELECTION DEFENDANTS:</p> <p>11 BURR & FORMAN, LLP BY: JANE W. TRINKLEY 1221 Main Street Suite 1800 Columbia, South Carolina 29201 803-799-9800 jtrinkley@burr.com (Via Videoconference)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17 ALSO PRESENT: Cyndi Nygord (Via Videoconference)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2</p> <p>3 ATTORNEYS FOR THE PLAINTIFFS</p> <p>4 THE SOUTH CAROLINA STATE CONFERENCE OF THE NAACP:</p> <p>5 NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC. BY: RAYMOND AUDAIN BY: JOHN CUSICK 40 Rector Street Fifth Floor New York, New York 10006 212-965-2200 raudain@naacpldf.org jcusick@naacpldf.org (Via Videoconference)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 and</p> <p>11 BY: ANTONIO L. INGRAM II 700 14th Street, NW Sixth Floor Washington, D.C. 20005 646-647-7754 aingram@naacpldf.org (Via Videoconference)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 ATTORNEYS FOR THOMAS C. ALEXANDER AND LUKE A. RANKIN:</p> <p>17 ROBINSON, GRAY, STEPP & LAFFITTE, LLC BY: ROBERT E. TYSON, JR. BY: LAJESSICA STRINGFELLOW 1310 Gadsden Street Columbia, South Carolina 29201 803-929-1400 rtyson@robinsongray.com lstringfellow@robinsongray.com (Via Videoconference)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 I N D E X</p> <p>2 Page Line</p> <p>3 EXAMINATION</p> <p>4 BY MR. TYSON..... 6/3</p> <p>5 BY MR. INGRAM..... 84/24</p> <p>6 CERTIFICATE OF REPORTER..... 86</p> <p>7 E X H I B I T S</p> <p>8 Page Line</p> <p>9 EXHIBIT 1, 6-26-21 SC State Conference, NAACP General Membership Meeting..... 30/20</p> <p>10</p> <p>11 EXHIBIT 2, 6-12-21 SC State Conference, NAACP Executive Committee Meeting Minutes..... 57/14</p> <p>12 EXHIBIT 3, 9-30-21 SC State Conference NAACP Reapportionment Coalition Meeting Minutes..... 73/7</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 BRENDA C. MURPHY,</p> <p>2 being first duly sworn, testified as follows:</p> <p>3 DIRECT EXAMINATION</p> <p>4 BY MR. TYSON:</p> <p>5 Q. Good morning, Ms. Murphy. My name is</p> <p>6 Rob Tyson. I'm an attorney for the Senate</p> <p>7 Defendants, President Alexander, and Senator Rankin,</p> <p>8 I guess as chair of the Judiciary Committee.</p> <p>9 Thank you for being here. Can you state</p> <p>10 your name?</p> <p>11 A. My name is Brenda C. Murphy,</p> <p>12 M-U-R-P-H-Y.</p> <p>13 Q. And where do you live, Ms. Murphy?</p> <p>14 A. Where do I live or where I am?</p> <p>15 Q. Yes, ma'am. Either one. Where do you</p> <p>16 live and where are you now?</p> <p>17 A. Okay. I live in Columbia, South</p> <p>18 Carolina. And I'm currently at 6111 North Main</p> <p>19 Street, Columbia, South Carolina.</p> <p>20 Q. Well, very good. And so I will go kind</p> <p>21 of through the rules, but you have now become a pro</p> <p>22 at being deposed. But if you can't hear me or if I</p> <p>23 ask a poor question, just ask me to repeat it.</p> <p>24 Okay?</p> <p>25 A. Okay.</p>	<p>1 the relevant questions and move on. Okay?</p> <p>2 A. Okay.</p> <p>3 Q. All right. You know the State</p> <p>4 Conference is the plaintiff in this case. Correct?</p> <p>5 A. Yes, I do.</p> <p>6 Q. All right. So you know we are going to</p> <p>7 trial in a couple of months. Right?</p> <p>8 A. Yes.</p> <p>9 Q. And you know the burden is on the</p> <p>10 plaintiff to prove the case. Correct?</p> <p>11 A. Yes.</p> <p>12 Q. So I'm going to ask questions today,</p> <p>13 just giving you a heads-up, just to kind of make</p> <p>14 sure I understand how you came about trying -- how</p> <p>15 you became a plaintiff, and then just try to get a</p> <p>16 little bit of a better understanding of what it is</p> <p>17 that you think the General Assembly should have done</p> <p>18 differently. Okay?</p> <p>19 A. Okay.</p> <p>20 Q. No real tricks to it. I just want to</p> <p>21 know a little bit more about how you got in the</p> <p>22 lawsuit and then why you got in the lawsuit, and</p> <p>23 then what do you expect to get out of it. Okay?</p> <p>24 A. Okay.</p> <p>25 Q. As you heard me say to the court</p>
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<p>1 Q. But the simple rules are you know you're</p> <p>2 under oath. Correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And so I'm going to ask some</p> <p>5 questions, and the court reporter is recording them.</p> <p>6 So when you speak, just make sure that you don't nod</p> <p>7 or you don't shake or whatever; that you do speak so</p> <p>8 the court reporter can hear you. Okay?</p> <p>9 A. Okay.</p> <p>10 Q. I'm going to ask questions. And there</p> <p>11 might be a possibility or probably -- a probability</p> <p>12 that Mr. Ingram is going to voice an objection. And</p> <p>13 if he does we will let him state his objection, and</p> <p>14 then if you would just go on and answer my question</p> <p>15 after he states his objection. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. We are not going to be here real long</p> <p>18 today, but -- you know, it's my birthday and so --</p> <p>19 A. Happy birthday.</p> <p>20 Q. Thank you. And not just that, but you</p> <p>21 have been deposed, and I think we have a good</p> <p>22 understanding of your testimony so I'm going to try</p> <p>23 not to repeat or rehash that. There might be some</p> <p>24 overlap, so I apologize, but we are going to try to</p> <p>25 kind of get to some stuff pretty quickly, just ask</p>	<p>1 reporter, we are going to take two depositions</p> <p>2 today. One, to start this morning, I'm just asking</p> <p>3 you questions for you as Ms. Murphy. Okay? As</p> <p>4 President Murphy.</p> <p>5 A. Okay.</p> <p>6 Q. Later, when we quit in an hour or two</p> <p>7 and ask I questions about -- and we stop and then we</p> <p>8 will go into it, we will have a 30(b)(6) deposition.</p> <p>9 And when I ask those questions and then when you</p> <p>10 respond, you're answering on behalf of the</p> <p>11 organization. Okay?</p> <p>12 A. Okay.</p> <p>13 Q. Do you see that difference? Do you</p> <p>14 understand that difference?</p> <p>15 A. I do.</p> <p>16 Q. Okay. So the first part will be just</p> <p>17 your personal opinion or how you see things</p> <p>18 personally, and the second part will be you're</p> <p>19 speaking for the organization.</p> <p>20 What's difficult sometimes is that those</p> <p>21 roles kind of blur, or those responsibilities kind</p> <p>22 of blur. So if my question is poor or you're not</p> <p>23 sure if I am asking you a question as Brenda Murphy</p> <p>24 versus as President Murphy, just let me know and</p> <p>25 then we can figure out how to go from there. Okay?</p>

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Page 42	<p>1 Q. And you said you began to have concerns</p> <p>2 prior to them drawing a map?</p> <p>3 A. Well, we were concerned whenever many</p> <p>4 individuals would talk -- well, they expressed</p> <p>5 concerns about -- their feeling that their voices</p> <p>6 were not heard. When litigation was filed it wasn't</p> <p>7 until, actually, in January -- January, February.</p> <p>8 So, you know, we had a chance to look at maps that</p> <p>9 were shared and individuals could voice their</p> <p>10 opinions.</p> <p>11 Q. Okay. I think we will follow back up on</p> <p>12 some of the litigation after a while.</p> <p>13 A. Okay.</p> <p>14 Q. Did you have a -- was it one of your</p> <p>15 goals to try to ensure that another</p> <p>16 majority-minority district was drawn of the seven</p> <p>17 Congressional districts?</p> <p>18 A. Was that a goal? Well, I don't think it</p> <p>19 was a goal. The only thing that we were concerned</p> <p>20 about is fair mapping and considering the criteria.</p> <p>21 It would always be good to have increased Black</p> <p>22 representation, but we know -- you know, there were</p> <p>23 changes in populations and shifting of numbers.</p> <p>24 Q. So you don't think it was a goal that</p> <p>25 you were going to go in and try to see, of the seven</p>	Page 44	<p>1 there is splitting -- to minimize splitting.</p> <p>2 Minimize packing in hopes of Black people being able</p> <p>3 to have some influence over who is elected as their</p> <p>4 representative.</p> <p>5 Q. All right. So let's go through some of</p> <p>6 those. You said it was important that they were</p> <p>7 contiguous. Right?</p> <p>8 A. Yes.</p> <p>9 Q. That doesn't have anything to do with</p> <p>10 race. Correct?</p> <p>11 A. Well, I think the main thing is that</p> <p>12 they are drawn in such a way that the Black vote has</p> <p>13 some influence over who serves, the individual.</p> <p>14 That's the primary goal.</p> <p>15 Q. Yes, ma'am. But contiguous means that a</p> <p>16 district would be next to each other. Right?</p> <p>17 A. Yeah. Yeah.</p> <p>18 Q. So that wouldn't have anything to do</p> <p>19 with race. Correct?</p> <p>20 A. Well, it might.</p> <p>21 Q. The communities of interest, are there</p> <p>22 communities of interest that don't involve race?</p> <p>23 A. Well, yeah. If you look at subsets,</p> <p>24 yes, community subsets within a community. But when</p> <p>25 we are talking communities of interest, we are</p>
Page 43	<p>1 Congressional districts, whether there could be</p> <p>2 another majority African-American district?</p> <p>3 MR. INGRAM: Objection.</p> <p>4 THE WITNESS: No, that was never stated.</p> <p>5 BY MR. TYSON:</p> <p>6 Q. Was it a goal to make sure that the six</p> <p>7 Congressional districts remained relatively the same</p> <p>8 such that an African-American member -- person could</p> <p>9 be elected there?</p> <p>10 MR. INGRAM: Objection.</p> <p>11 THE WITNESS: Let me say, whenever we</p> <p>12 were looking at communities it was more to serve the</p> <p>13 people, to ensure that packing and cracking did not</p> <p>14 occur in certain areas to minimize the influence of</p> <p>15 the Black voter. We had no -- you know, when we</p> <p>16 looked at this it was not with the intention of</p> <p>17 looking at who was where, not at all.</p> <p>18 BY MR. TYSON:</p> <p>19 Q. When you said that you looked at</p> <p>20 criteria, what were some of those criteria that were</p> <p>21 important to you? When you said you wanted to have</p> <p>22 fair mapping, you considered criteria, what are some</p> <p>23 of those criteria?</p> <p>24 A. Communities being contiguous.</p> <p>25 Communities of interest not done in such a way that</p>	Page 45	<p>1 talking about those individuals that are served by,</p> <p>2 you know, a county, for example, being split three</p> <p>3 different ways, that's just not good. Individuals</p> <p>4 with similar interests, use the same hospitals, are</p> <p>5 being placed in another area where the interests are</p> <p>6 not the same.</p> <p>7 Q. And I agree with you. I'm not arguing</p> <p>8 with you about what those communities look like.</p> <p>9 But again, if we are trying to look at individuals</p> <p>10 with similar interests or same interests are being</p> <p>11 placed -- well, let's just look at it that way.</p> <p>12 That doesn't just relate to African-American voters,</p> <p>13 does it?</p> <p>14 MR. INGRAM: Objection.</p> <p>15 THE WITNESS: Well, you know, it depends</p> <p>16 on how you look at that.</p> <p>17 BY MR. TYSON:</p> <p>18 Q. And that's right. That's 100 percent</p> <p>19 accurate. But I was just trying to -- are there</p> <p>20 communities of interest that could be -- that might</p> <p>21 have same -- similar interests but might not be</p> <p>22 African-American voters? Does that --</p> <p>23 A. Yeah. Have similar interests, yes.</p> <p>24 Q. Yes, ma'am.</p> <p>25 A. I would say yes.</p>

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