

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

THOMAS C. ALEXANDER, in his official
capacity as President of the Senate;
LUKE A. RANKIN, in his official capacity as
Chairman of the Senate Judiciary Committee;
JAMES H. LUCAS, in his official capacity as
Speaker of the House of Representatives;
CHRIS MURPHY, in his official capacity as
Chairman of the House of Representatives
Judiciary Committee; WALLACE H.
JORDAN, in his official capacity as Chairman
of the House of Representatives Elections Law
Subcommittee; HOWARD KNAPP, in his
official capacity as interim Executive Director
of the South Carolina State Election
Commission; JOHN WELLS, Chair,
JOANNE DAY, CLIFFORD J. ELDER,
LINDA MCCALL, and SCOTT MOSELEY,
in their official capacities as members of the
South Carolina State Election Commission,

Defendants.

Case No. 3:21-cv-03302-TJH-RMG-MGL

**SECOND JOINT STIPULATION
REGARDING DEPOSITIONS ON
CONGRESSIONAL PLAN**

WHEREAS Plaintiffs, The South Carolina State Conference of the NAACP and Taiwan
Scott, on behalf of himself and all other similarly situated persons, and all above-named

Defendants, by and through their undersigned counsel, hereby desire to enter into this second stipulation concerning Federal Rule of Civil Procedure 30(a) and the applicability of certain portions of the Local Civil Rules regarding depositions in the District of South Carolina;

WHEREAS Plaintiffs and all Defendants above named may be collectively referred to herein as the “**Parties**”;

WHEREAS the above-captioned case, Civil Action No. 3:21-cv-03302-TJH-RMG-MGL, may be referred to herein as the “**Action**”;

WHEREAS Plaintiffs’ operative Third Amended Complaint pleads challenges to the Congressional Plan but not to the House Plan previously challenged in this Action; and

WHEREAS the Parties met and conferred and reached an agreement regarding the operation of the Local Civil Rules (D.S.C.), for the purposes of avoiding unnecessary disputes that could arise throughout the course of depositions in this Action due to its streamlined nature.

NOW, THEREFORE, IT IS on this 25th day of July, 2022, STIPULATED as follows:

1. The Parties agree that each side may take no more than twenty-five (25) additional depositions, including expert witness depositions, without leave of court.
2. The Parties agree to schedule a limited number of depositions during the week of August 15, which will not impact the deadlines set in the Court’s Scheduling Orders (Dkt. Nos. 180, 210, and 305).
3. The Parties may modify this Second Joint Stipulation, provided, however, that any modification shall not be effective unless it appears in a writing signed by all Parties.
4. All other aspects of the Joint Stipulation (Dkt. No. 288) remain unchanged.

Dated: July 25, 2022

Respectfully submitted,

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