

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

COUNTY OF WAKE

2021 NOV 16 P 4:30T
CYS

NORTH CAROLINA LEAGUE OF CONSERVATION
VOTERS, INC.; HENRY M. MICHAUX, JR.; DANDRIELLE
LEWIS; TIMOTHY CHARTIER; TALIA FERNÓS;
KATHERINE NEWHALL; R. JASON PARSLEY; EDNA
SCOTT; ROBERTA SCOTT; YVETTE ROBERTS; JEREANN
KING JOHNSON; REVEREND REGINALD WELLS;
YARBROUGH WILLIAMS, JR.; REVEREND DELORIS L.
JERMAN; VIOLA RYALS FIGUEROA; and COSMOS
GEORGE,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official capacity as
Chair of the House Standing Committee on Redistricting;
SENATOR WARREN DANIEL, in his official capacity as Co-
Chair of the Senate Standing Committee on Redistricting and
Elections; SENATOR RALPH E. HISE, JR., in his official
capacity as Co-Chair of the Senate Standing Committee on
Redistricting and Elections; SENATOR PAUL NEWTON, in
his official capacity as Co-Chair of the Senate Standing
Committee on Redistricting and Elections; REPRESENTATIVE
TIMOTHY K. MOORE, in his official capacity as Speaker of
the North Carolina House of Representatives; SENATOR
PHILIP E. BERGER, in his official capacity as President Pro
Tempore of the North Carolina Senate; THE STATE OF
NORTH CAROLINA; THE NORTH CAROLINA STATE
BOARD OF ELECTIONS; DAMON CIRCOSTA, in his official
capacity as Chairman of the North Carolina State Board of
Elections; STELLA ANDERSON, in her official capacity as
Secretary of the North Carolina State Board of Elections; JEFF
CARMON III, in his official capacity as Member of the North
Carolina State Board of Elections; STACY EGGERS IV, in his
official capacity as Member of the North Carolina State Board of
Elections; TOMMY TUCKER, in his official capacity as
Member of the North Carolina State Board of Elections; and
KAREN BRINSON BELL, in her official capacity as Executive
Director of the North Carolina State Board of Elections,

Defendants.

AFFIDAVIT OF
STEPHEN D.
FELDMAN

1. I, Stephen D. Feldman, am an attorney at Robinson, Bradshaw & Hinson, P.A., counsel for Plaintiffs in this matter. I submit this affidavit to attest to the authenticity of the exhibits, attached hereto, in support of Plaintiffs' Verified Complaint and Motion for a Preliminary Injunction.

2. Exhibit A consists of the congressional map enacted by the General Assembly on November 4, 2021, as S.B. 740, S.L. 2021-174.

3. Exhibit B consists of the North Carolina Senate map enacted by the General Assembly on November 4, 2021, as S.B. 739, S.L. 2021-173.

4. Exhibit C consists of the North Carolina House of Representatives map enacted by the General Assembly on November 4, 2021, as H.B. 976, S.L. 2021-175.

5. Exhibit D consists of the map identified in Plaintiffs' Verified Complaint as the Optimized Congressional Map.

6. Exhibit E consists of the map identified in Plaintiffs' Verified Complaint as the Optimized Senate Map.

7. Exhibit F consists of the map identified in Plaintiffs' Verified Complaint as the Optimized House Map.

8. Exhibit G consists of the locational data for the Optimized Congressional Map.

9. Exhibit H consists of the locational data for the Optimized Senate Map.

10. Exhibit I consists of the locational data for the Optimized House Map.

11. Exhibit J consists of Press Release, U.S. Census Bureau, *Census Bureau Statement on Redistricting Data Timeline* (Feb. 12, 2021), <https://www.census.gov/newsroom/press-releases/2021/statement-redistricting-data-timeline.html>.

12. Exhibit K consists of Press Release, U.S. Census Bureau, *2020 Census Statistics Highlight Local Population Changes and Nation's Ethnic and Racial Diversity* (Aug. 12, 2021), <https://www.census.gov/newsroom/press-releases/2021/population-changes-nations-diversity.html>.

13. Exhibit L consists of *A Look Back at North Carolina's Historic 2020 Election & Looking Ahead at 2021*, N.C. State Board of Elections (Feb. 24, 2021) <https://www.ncleg.gov/documentsites/committees/House2021-21/02-24-21/House%20Elections%20Committee%20Presentation%202-24-2021%20FINALv2.pdf>.

14. Exhibit M consists of *Amendment to Proposed Criteria*, House Committee on Redistricting & Senate Committee on Redistricting and Elections, N.C. General Assembly (Aug. 12, 2021), <https://www.ncleg.gov/documentsites/committees/Senate2021-154/2021/08-12-2021/Proposed%20Amendments/Voting%20Rights%20Act.Amendment.pdf>.

15. Exhibit N consists of *Criteria Adopted by the Committees*, House Committee on Redistricting & Senate Committee on Redistricting and Elections, N.C. General Assembly (Aug. 12, 2021), <https://www.ncleg.gov/documentsites/committees/Senate2021-154/2021/08-12-2021/Criteria.adopted.8.12.pdf>.

16. Exhibit O consists of Christopher Cooper et al., *NC General Assembly County Clusterings from the 2020 Census*, Quantifying Gerrymandering (Aug. 17, 2021), <https://sites.duke.edu/quantifyinggerrymandering/files/2021/08/countyClusters2020.pdf>.

17. Exhibit P consists of *Joint Public Hearing Schedule*, House Committee on Redistricting & Senate Committee on Redistricting and Elections, N.C. General Assembly (Sept. 13, 2021), <https://www.ncleg.gov/documentsites/committees/Senate2021->

154/2021/General%20Redistricting%20Information/Public%20Hearing%20Schedule%20with%20addresses.pdf.

18. Exhibit Q consists of *2021 Joint Redistricting Committee Proposed Criteria*, House Committee on Redistricting & Senate Committee on Redistricting and Elections, N.C. General Assembly, <https://www.ncleg.gov/documentsites/committees/Senate2021-154/2021/08-09-2021/2021%20Joint%20Redistricting%20Committee%20Plan%20Proposed%20Criteria.pdf>.

19. Exhibit R consists of *Duke Senate Groupings*, Senate Redistricting and Elections Committee, N.C. General Assembly, <https://ncleg.gov/documentsites/committees/Senate2021-154/2021/10-05-2021/Duke%20Senate%20Groupings%20Maps%2011x17.pdf>.

20. Exhibit S consists of *Duke House Groupings*, House Redistricting Committee, N.C. General Assembly, <https://ncleg.gov/documentsites/committees/House2021-182/2021/10-05-21/Duke%20House%20Groupings%20Maps%2011x17.pdf>.

21. Exhibit T consists of *Running for Office*, N.C. State Board of Elections, <https://www.ncsbe.gov/candidates/running-office>.

22. Exhibit U consists of Bryan Anderson, *N Carolina Elections Head: Delay '21 City Races, '22 Primary*, Associated Press (Feb. 23, 2021), <https://apnews.com/article/redistricting-municipal-elections-north-carolina-elections-fdc23aca0ba9981944a944923937f46c>.

23. Exhibit V consists of Lucille Sherman, *NC Lawmakers Move to Bar the Use of Racial, Election Data in Drawing Election Districts*, Raleigh News & Observer (Aug. 11, 2021), <https://www.newsobserver.com/news/politics-government/article253397675.html>.

24. Exhibit W consists of Rusty Jacobs, *NC Lawmakers Adopt Criteria for Next Round of Redistricting*, WUNC (Aug. 12, 2021), <https://www.wunc.org/politics/2021-08-12/nc-lawmakers-adopt-criteria-for-next-round-of-redistricting>.

25. Exhibit X consists of Lucille Sherman, *NC Lawmakers Will Not Use Racial and Election Data from the Census to Draw District Maps*, Raleigh News & Observer (Aug. 13, 2021), <https://www.newsobserver.com/news/politics-government/article253434564.html>.

26. Exhibit Y consists of Yanqi Xu, *Republican Legislators Reject Democrats' Proposal to Include Racial Data in Redistricting*, NC Policy Watch (Aug. 13, 2021), <https://www.ncpolicywatch.com/2021/08/13/republican-legislators-reject-democrats-proposal-to-include-racial-data-in-redistricting>.

27. Exhibit Z consists of Charles Duncan, *First Maps Posted in N.C. Redistricting, Public Hearings Scheduled*, Spectrum News 1 (Oct. 21, 2021), <https://spectrumlocalnews.com/nc/charlotte/politics/2021/10/21/first-maps-posted-in-n-c--redistricting--public-hearings-scheduled>.

28. Exhibit AA consists of Gary D. Robertson, *NC Redistricting Hearing Speakers Criticize GOP Proposals*, Associated Press (Oct. 25, 2021), <https://www.usnews.com/news/best-states/north-carolina/articles/2021-10-25/public-hearings-offer-input-on-nc-redistricting-proposals>.

29. Exhibit AB consists of Will Doran, *NC Lawmakers File Their Official Redistricting Plans, Giving GOP a Solid Edge*, Raleigh News & Observer (Oct. 29, 2021), <https://www.newsobserver.com/news/politics-government/article255390786.html>.

30. Exhibit AC consists of Gary D. Robertson, *NC Congressional Map That Helps GOP Gets Senate Panel's OK*, Associated Press (Nov. 1, 2021), <https://apnews.com/article/north-carolina-legislature-voting-rights-redistricting-congress-f11be13a63b159abaa926928c96413a2>.

31. Exhibit AD consists of Will Doran & Brian Murphy, *North Carolina Could Have New Political Maps This Week. Here's Where Things Stand*, Raleigh News & Observer (Nov. 3, 2021), <https://www.newsobserver.com/news/politics-government/article255506961.html>.

32. Exhibit AE consists of Will Doran, *Take a Closer Look at North Carolina's Approved Political Maps for Congress, Legislature*, Raleigh News & Observer (Nov. 4, 2021), <https://www.newsobserver.com/news/politics-government/article255552826.html>.

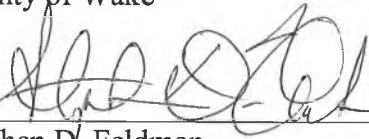
33. Exhibit AF consists of Gary D. Robertson, *North Carolina GOP Nears Completion of Redistricting Maps*, Associated Press (Nov. 4, 2021), <https://www.newsobserver.com/news/state/north-carolina/article255525166.html>.

34. Exhibit AG consists of Charles Duncan, *Redistricting in N.C.: New Maps Approved, Favoring GOP*, Spectrum News 1 (Nov. 4, 2021), <https://spectrumlocalnews.com/nc/charlotte/politics/2021/11/04/redistricting-in-n-c---new-maps-approved--favoring-gop>.

35. Exhibit AH consists of Rusty Jacobs, *The General Assembly Has Passed GOP-Drawn Maps, Setting Stage for Likely Legal Challenges*, WFAE (Nov. 4, 2021), <https://www.wfae.org/politics/2021-11-04/the-general-assembly-has-passed-gop-drawn-maps-setting-stage-for-likely-legal-challenges>.

North Carolina


County of Wake



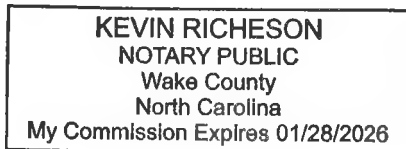
Stephen D. Feldman

Sworn to (or affirmed) and subscribed before me this the 16th day of November, 2021.

(Official Seal)



Official Signature of Notary



Kevin Richeson, Notary Public

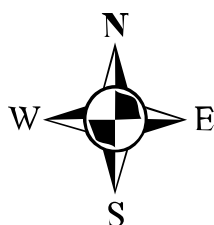
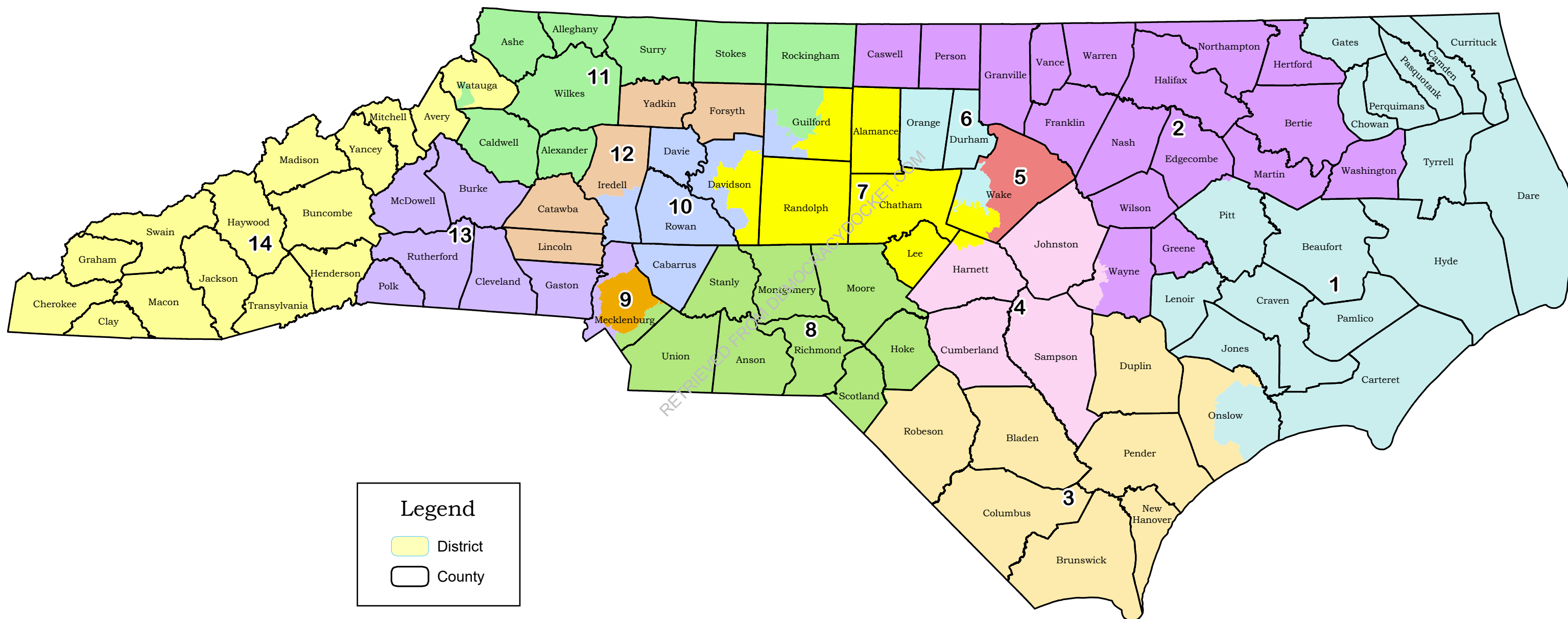
My commission expires: 01/28/2026

RETRIEVED FROM DEMOCRACYPOCKET.COM

EXHIBIT A

RETRIEVED FROM DEMOCRACYDOCKET.COM

S.L. 2021-174 Congress



SL 2021-174 Congress

Printed by the NC General Assembly, November 4, 2021

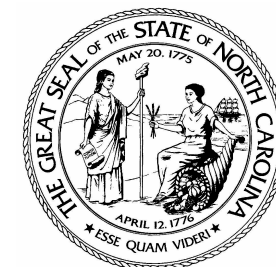
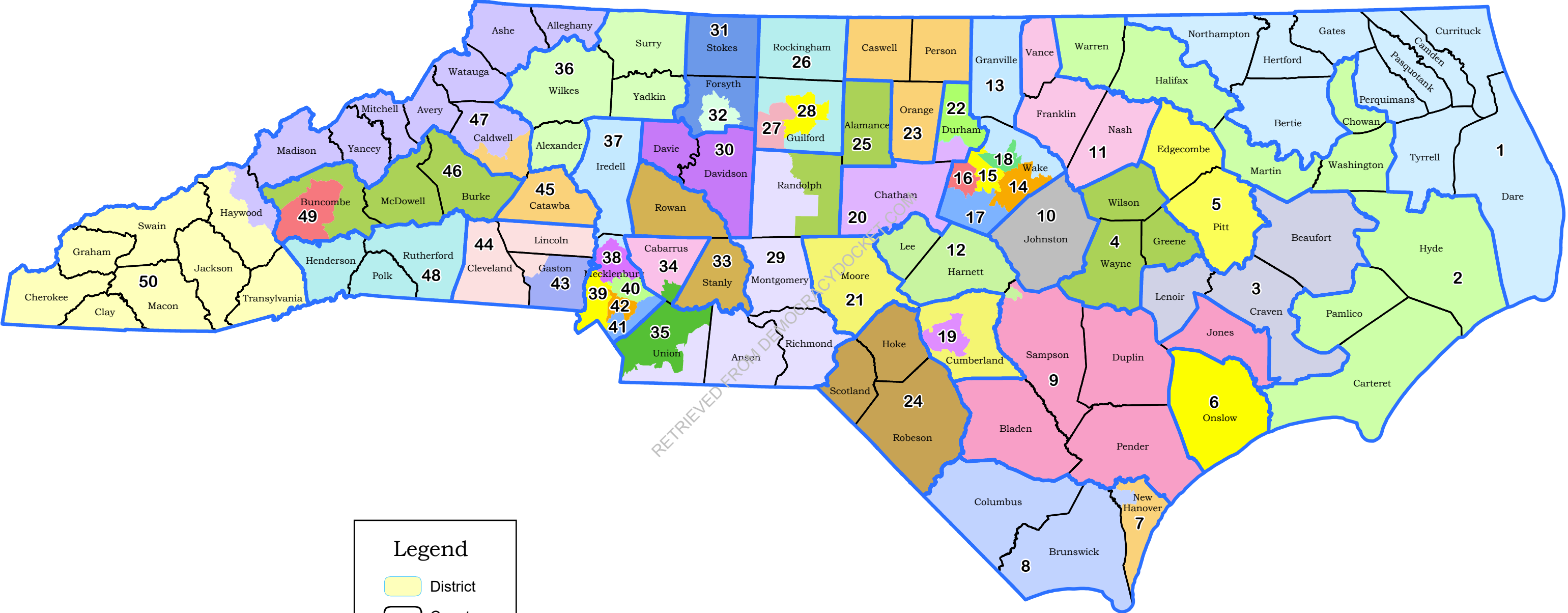


EXHIBIT B

RETRIEVED FROM DEMOCRACYDOCKET.COM

S.L. 2021-173 Senate



Legend

- District
- County
- Groupings

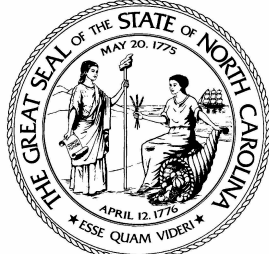
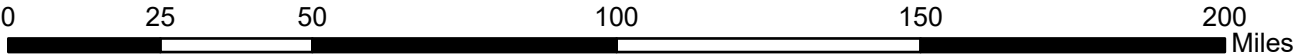
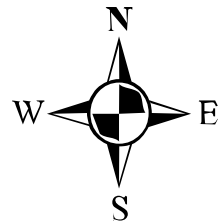
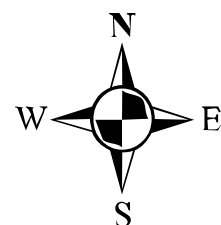
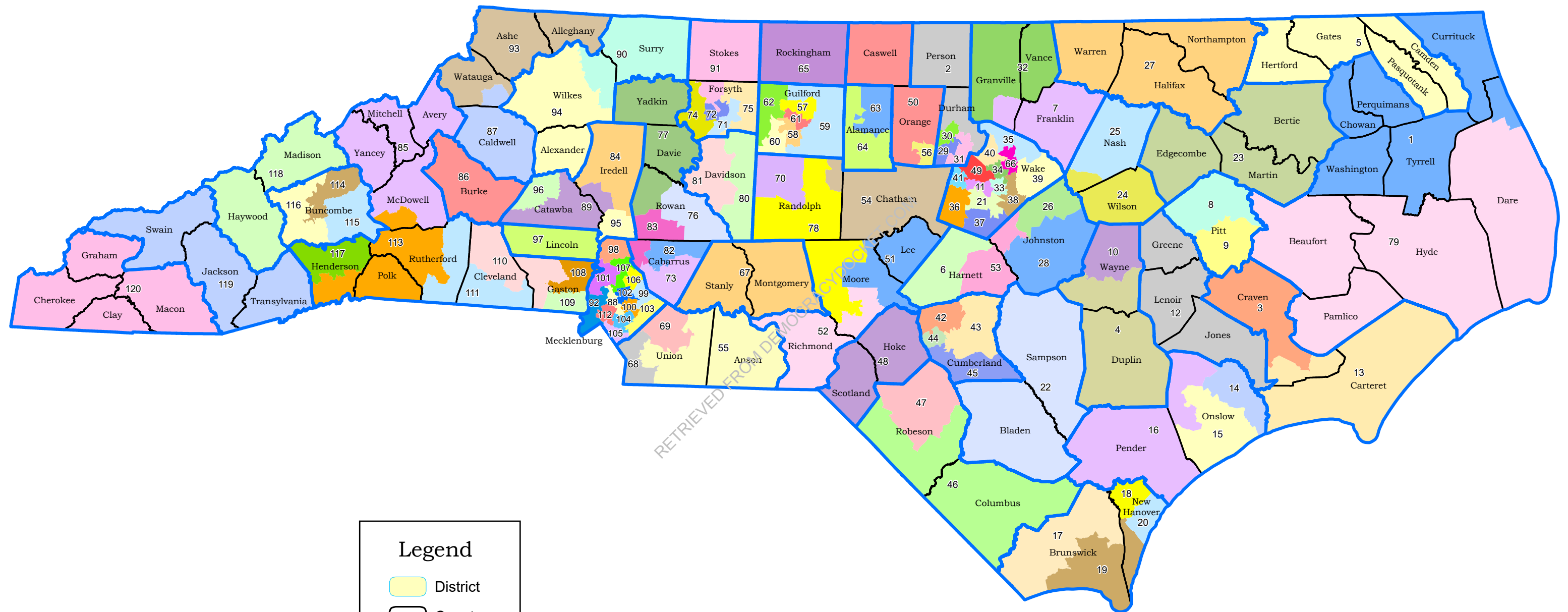


EXHIBIT C

RETRIEVED FROM DEMOCRACYDOCKET.COM

S.L. 2021-175 House



Source: SL 2021-175 House

Printed by the NC General Assembly, November 4, 2021

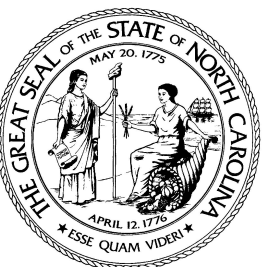
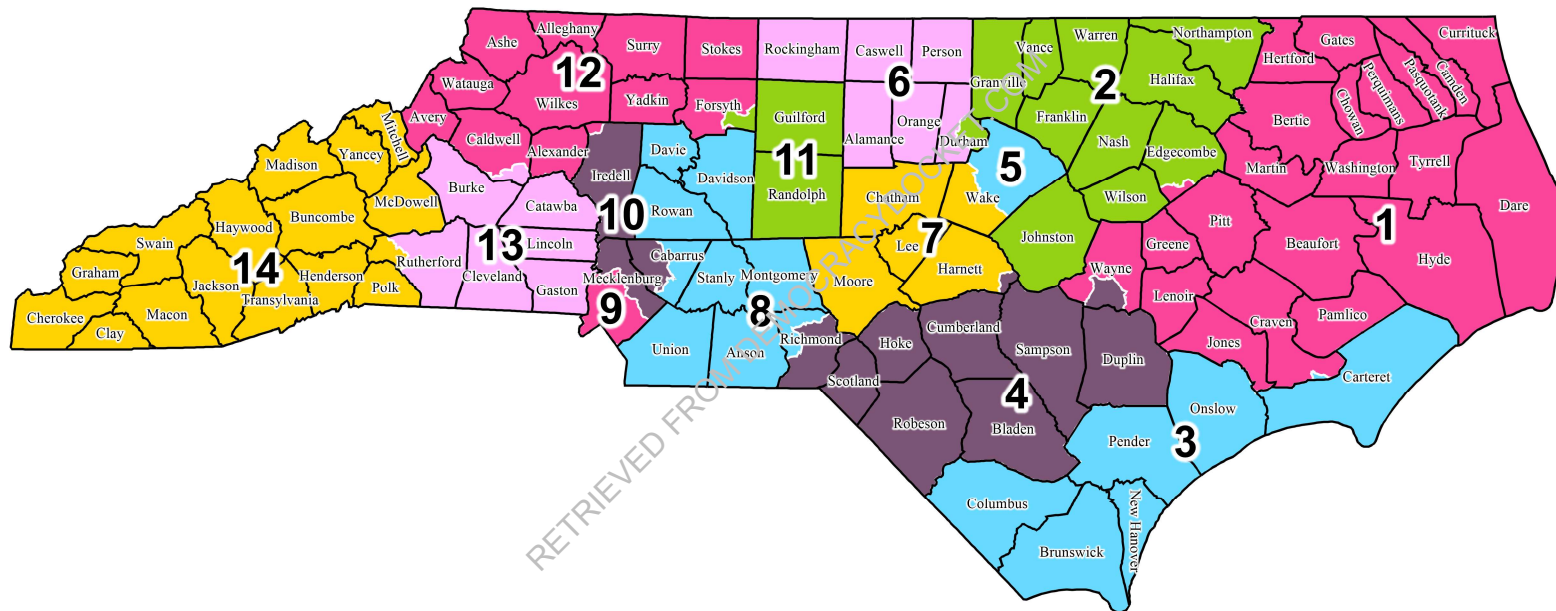


EXHIBIT D

RETRIEVED FROM DEMOCRACYDOCKET.COM



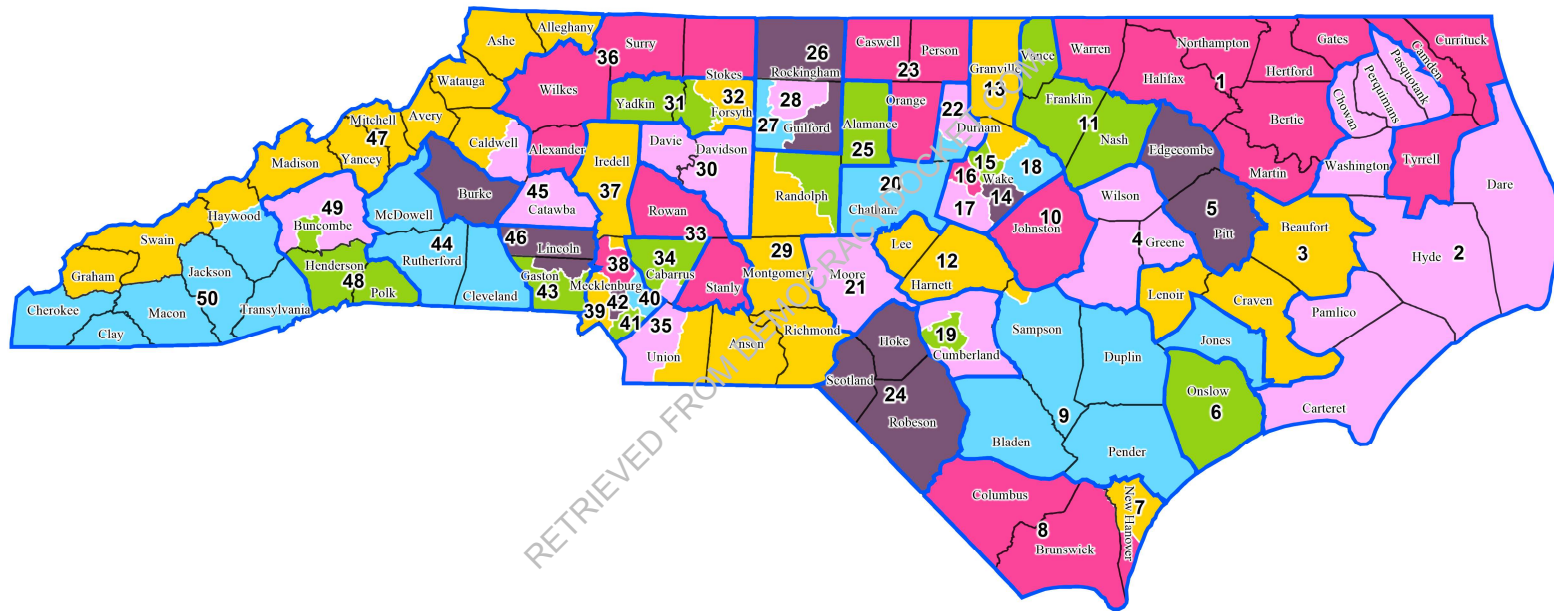
©2021 CALIPER

Legend

- Districts
- County

EXHIBIT E

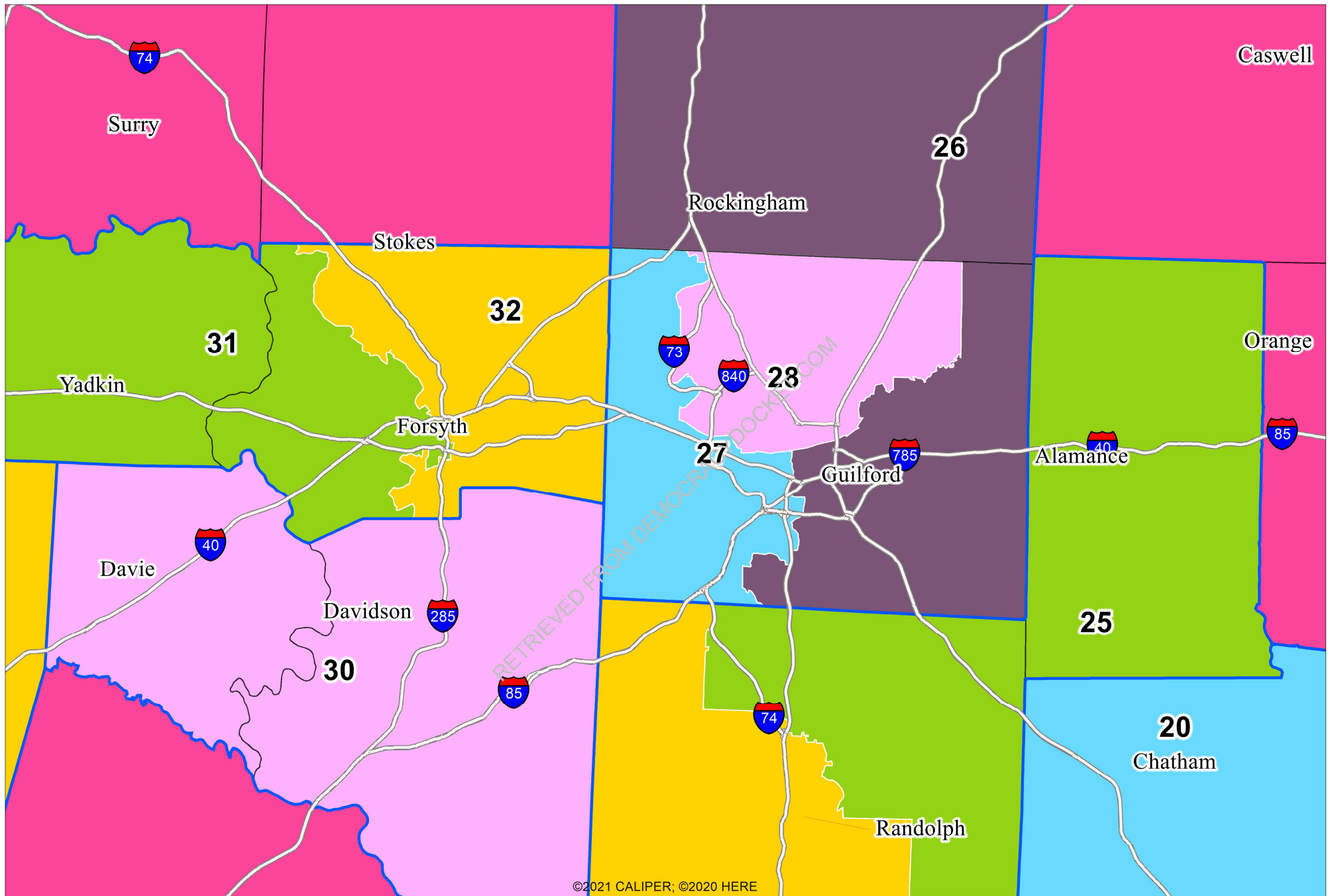
RETRIEVED FROM DEMOCRACYDOCKET.COM



©2021 CALIPER

Legend

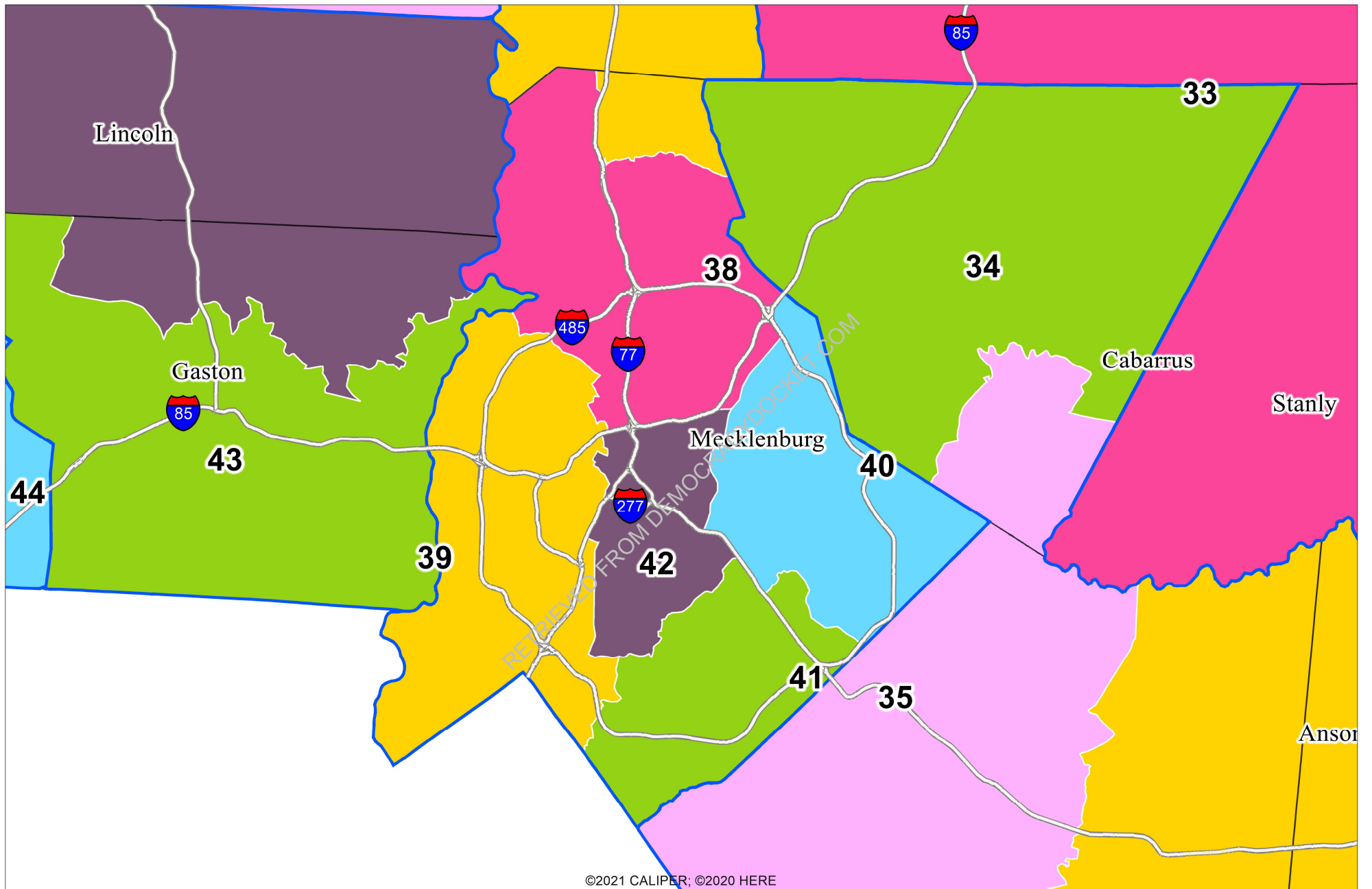
- District
- County
- Grouping



©2021 CALIPER; ©2020 HERE

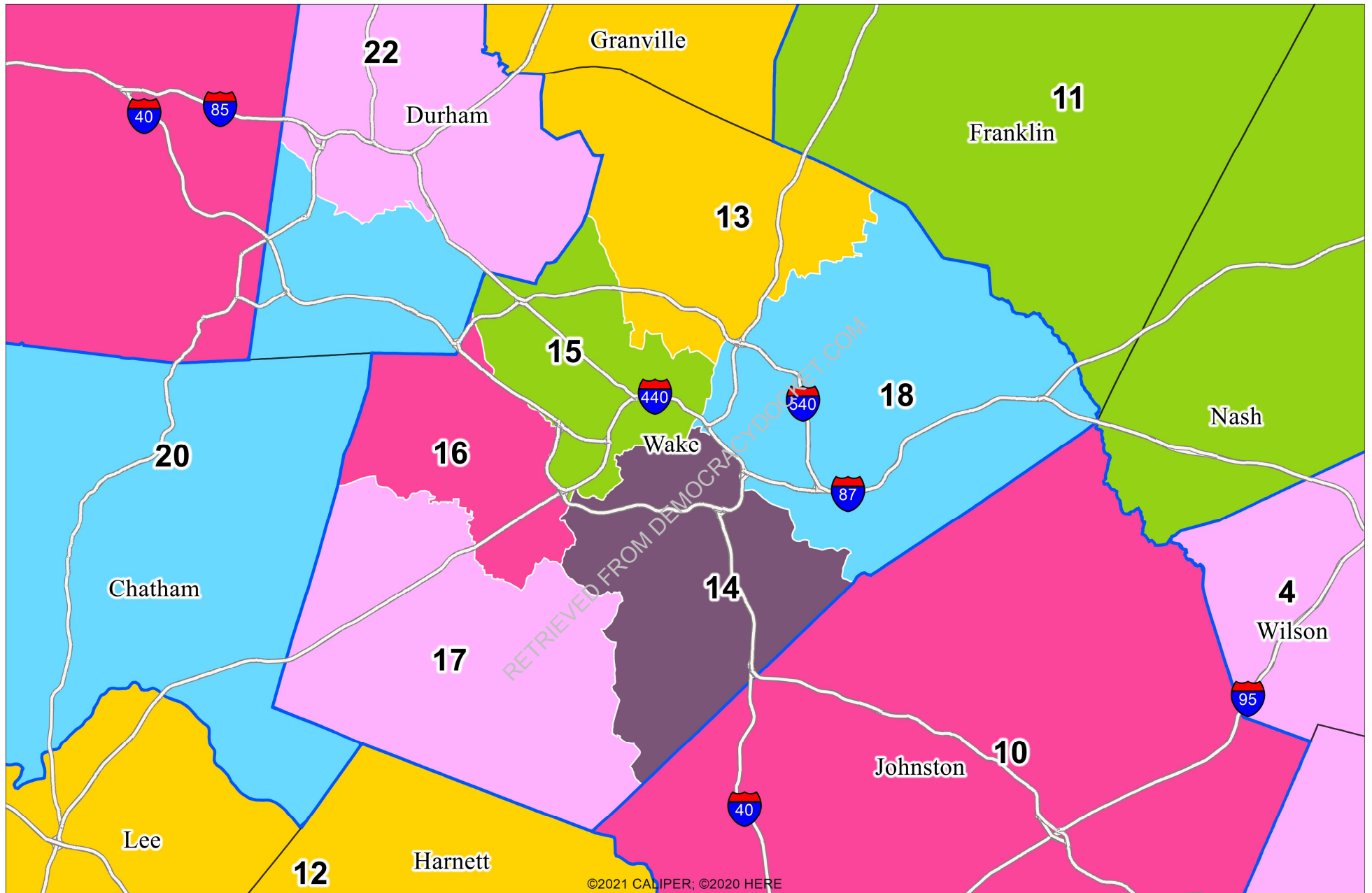
Legend

- District
- County
- Grouping
- Interstate



Legend

- District
- County
- Grouping
- Interstate

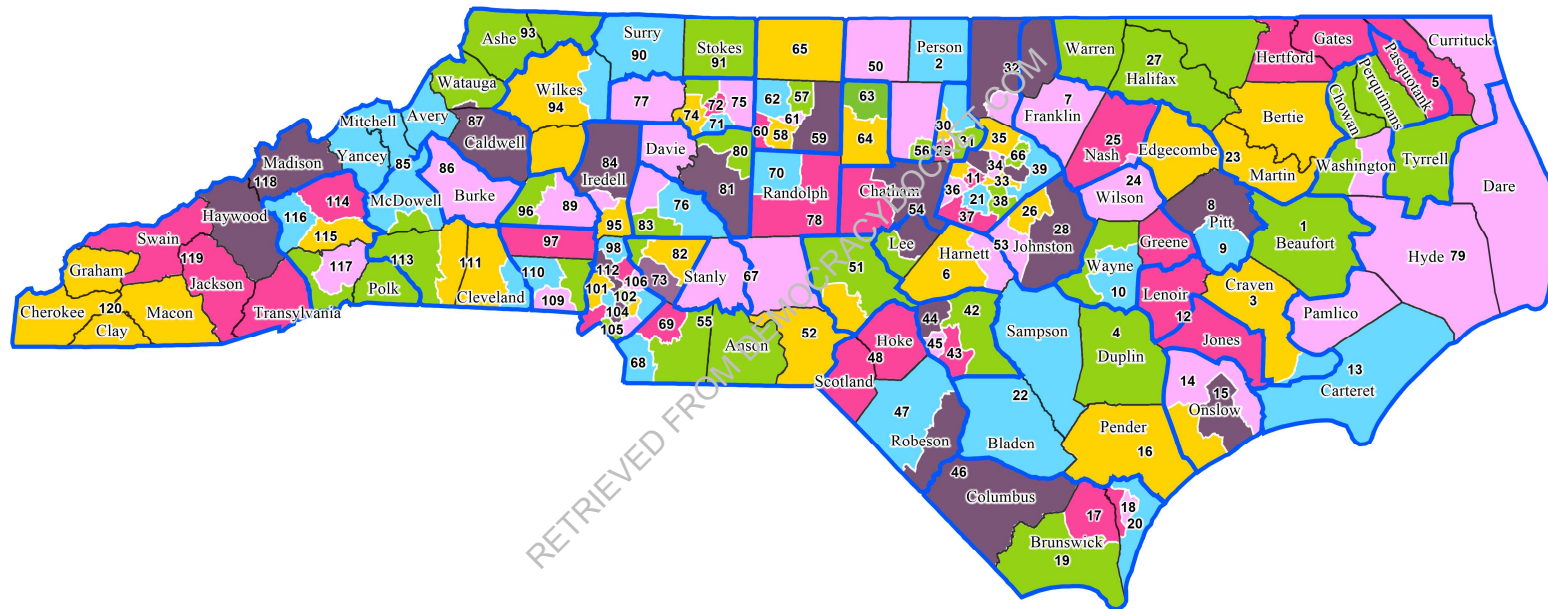


Legend

- District
- County
- Grouping
- Interstate

EXHIBIT F

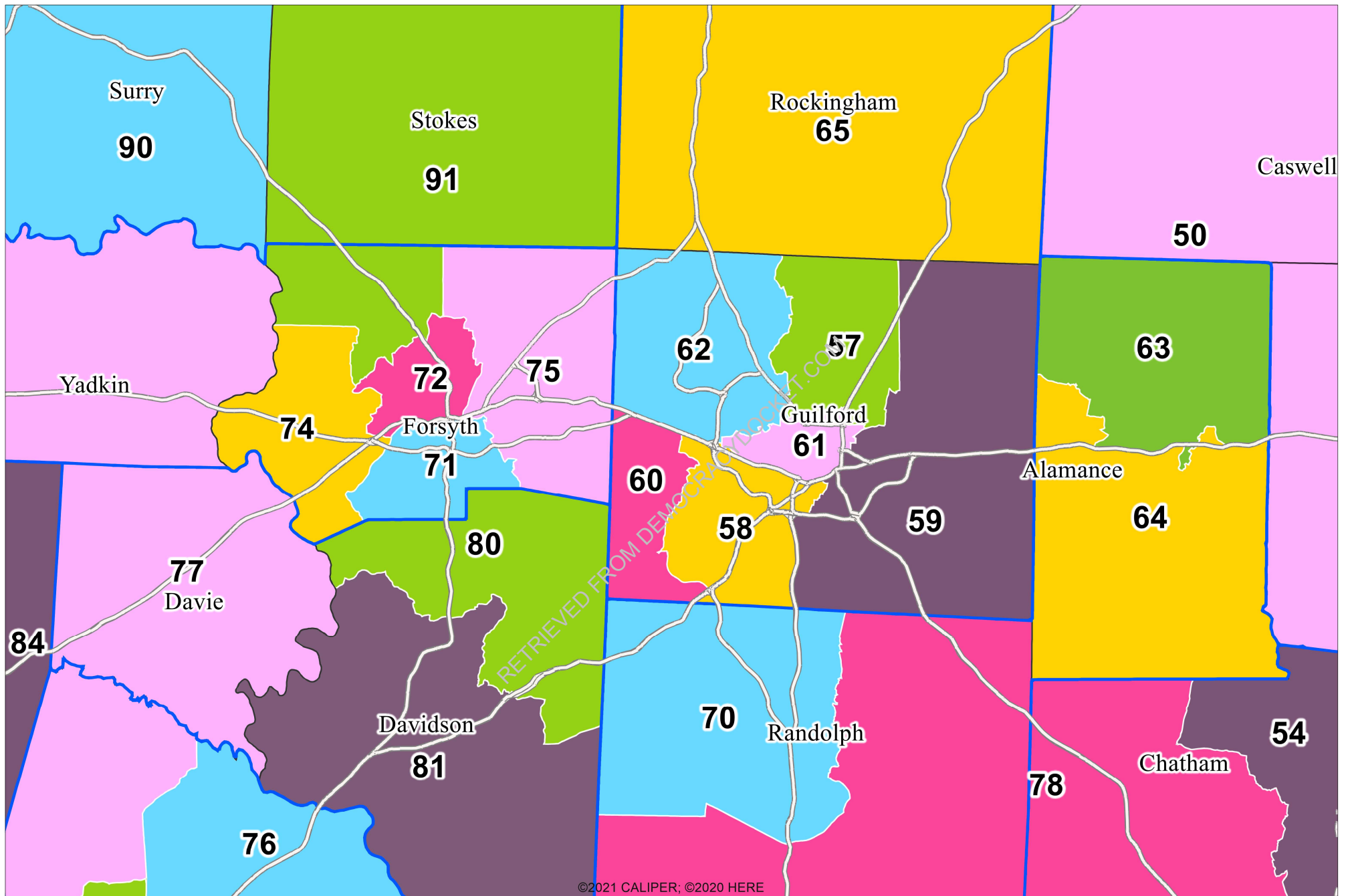
RETRIEVED FROM DEMOCRACYDOCKET.COM



©2021 CALIPER

Map layers

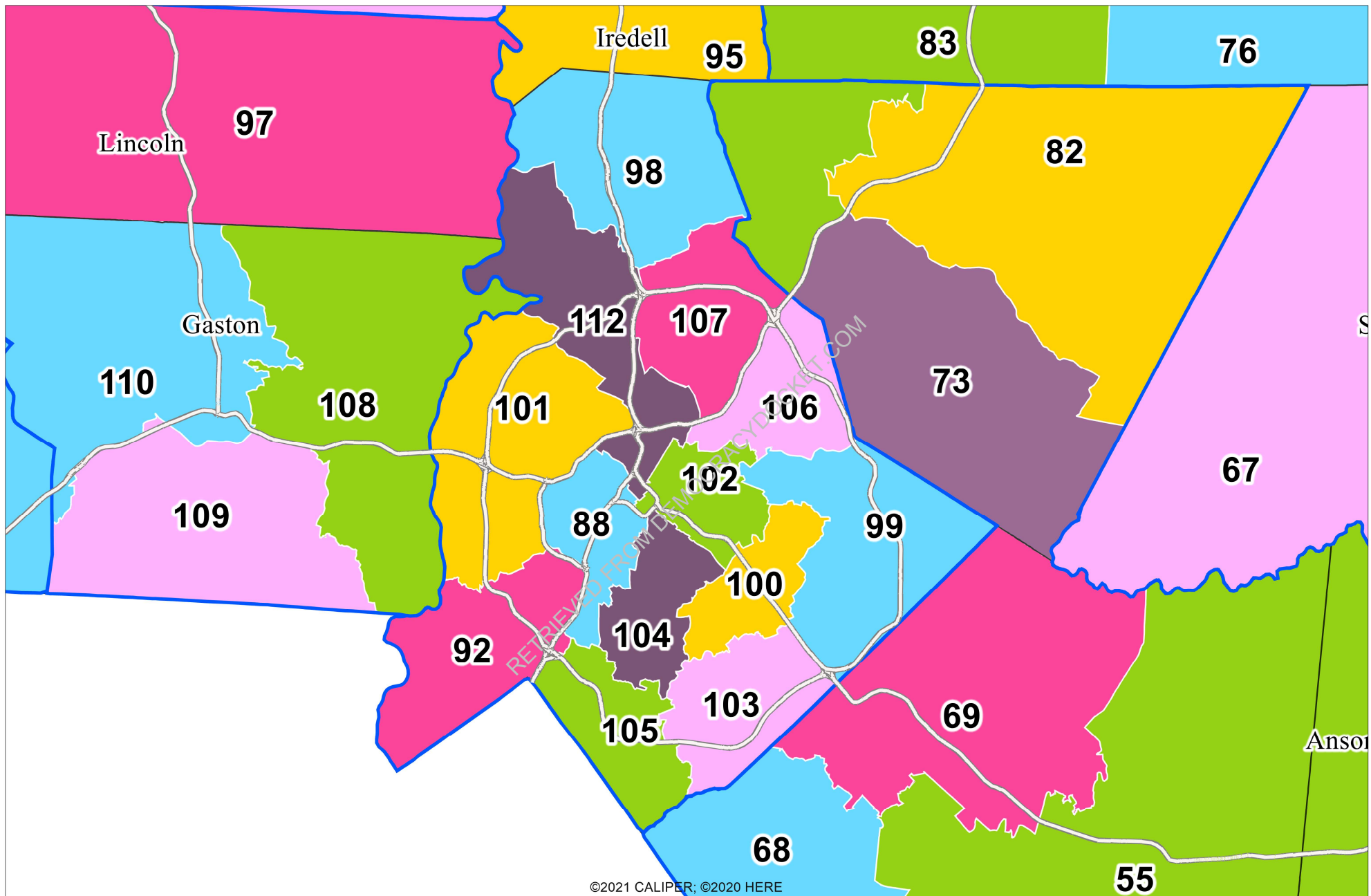
- Districts
- County
- Grouping



©2021 CALIPER, ©2020 HERE

Map layers

- Districts
- County
- Grouping
- Interstate



Map layers

- Districts
- County
- Grouping
- Interstate

