

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JOAQUÍN CARCAÑO et al., )  
 )  
Plaintiffs, )  
 )  
vs. ) CASE NO. 1:16-CV-00236-TDS-JEP  
 )  
PATRICK MCCRORY, in his official capacity )  
as Governor of North Carolina, et al., )  
 )  
Defendants. )

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UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. ) CASE NO. 1:16-CV-00425-TDS-JEP  
 )  
STATE OF NORTH CAROLINA et al., )  
 )  
Defendants. )

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NORTH CAROLINIANS FOR PRIVACY, )  
an unincorporated nonprofit association; )  
 )  
Plaintiffs, )  
 )  
vs. ) CASE NO. 1:16-CV-845-TDS-JEP  
 )  
 )  
UNITED STATES DEPARTMENT )  
OF JUSTICE et al., )  
 )  
Defendants. )

**JOINT NOTICE OF ISSUES**

Pursuant to this Court's Order of August 18, 2016, counsel for all parties in the above captioned actions have conferred and submit this Joint Notice.

On August 23, 2016, counsel for all parties engaged in a telephonic conference regarding several issues that have arisen in these cases as to the scope of discovery. A second telephonic conference among counsel was held on the afternoon of August 24, 2016. During both conferences, counsel for all parties expressed concern that, given the abbreviated pre-trial discovery schedule in these cases, the number of proposed depositions and the scope of written discovery may prove extremely onerous to accomplish within the allotted time frame. Consequently, the parties discussed whether the number of depositions (both fact and expert) may be limited, whether they can reach agreement as to certain issues regarding the nature and scope of written discovery, and whether they can agree to factual stipulations that might reduce the number of witnesses to be called at trial. The parties have also discussed proposals regarding electronic discovery as well as a proposed protective order. Additionally, the parties expressed the need to have further discussions regarding issues likely to arise concerning legislative and other privileges.

The parties are earnestly seeking to resolve these issues without the Court's intervention. The parties do not believe a conference with the Court is necessary at this time, but a conference may be useful at the next regularly scheduled time if they are unable to reach agreement as to the matters currently under discussion. The parties will notify the Court if that is the case.

*(Signatures of counsel appear on the following pages.)*

Respectfully submitted,

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83.1(d)

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participating attorneys.

This the 24th day of August, 2016.

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