

APPENDIX 1

League of Women Voters Plaintiffs

DECLARATION OF WALTER L. SALINGER
DATED JULY 10, 2018

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

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, *et al.*,

Plaintiffs,

v.

ROBERT A. RUCHO, in his official
capacity as Chairman of the North Carolina
Senate Redistricting Committee for the
2016 Extra Session and Co-Chairman of
the 2016 Joint Select Committee on
Congressional Redistricting, *et al.*,

Defendants.

CIVIL ACTION
NO. 1:16-CV-1164

THREE-JUDGE COURT

DECLARATION OF WALTER L. SALINGER

I, Walter L. Salinger, under penalty of perjury, declare the following:

1. I am a recent Director of the League of Women Voters of North Carolina (“LWVNC”), a plaintiff in the above captioned case. I just left my role on the Board of Directors as of July 1, 2018.
2. In that role, among other things, I monitored and analyzed our statewide membership database. Because of my deep familiarity with that database, I continue to assist the co-Presidents and Board in issues relating to member data, and was asked to provide this declaration because of that familiarity.
3. I am authorized to speak for the LWVNC in this case.


4. I am aware that in this litigation, the Defendants have stipulated to the fact that the League of Women Voters of North Carolina has members in each of the state's thirteen congressional districts, and that it has members in each of those districts who are registered as Democrats, support and vote for Democratic candidates, and have an interest in furthering policies at the national level that are consistent with the Democratic Party platform. I have reviewed that stipulation, which has been marked as Exhibit 4080.
5. I was asked by my attorneys in this case to provide more information as it relates to that stipulation. Specifically, I was asked to clarify some actual precincts within each of those congressional districts, in which those referenced LWNVC members specifically lived. As I understand it, this information may be used to help the court confirm that the LWNVC does indeed have standing to litigate this case.
6. Based on my review and comparison of the LWNVC membership database and with publicly available information in the North Carolina voter registration database, I am personally aware of the following facts:
 - a. At least one member of the League of Women Voters of North Carolina lives in Precinct 20-11 in Wake County, is registered to vote as a Democrat and regularly votes in Democratic primaries;
 - b. At least one member of the League of Women Voters of North Carolina lives in Precinct 01-04 in Wake County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;

- c. At least one member of the League of Women Voters of North Carolina lives in Precinct 074 in Forsyth County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- d. At least one member of the League of Women Voters of North Carolina lives in Precinct NCGR2 in Guilford County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- e. At least one member of the League of Women Voters of North Carolina lives in Precinct 13 in Wayne County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- f. At least one member of the League of Women Voters of North Carolina lives in Precinct “Eureka / Whispering Pines” in Moore County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- g. At least one member of the League of Women Voters of North Carolina lives in Precinct “West Newton” in Catawba County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- h. At least one member of the League of Women Voters of North Carolina lives in Precinct Drexel 01 in Burke County, is registered to vote as a Democrat, and regularly votes in Democratic primaries;
- i. At least one member of the League of Women Voters of North Carolina lives in Precinct 020 in Mecklenburg County, is registered to vote as a Democrat, and regularly votes in Democratic primaries; and

- j. At least one member of the League of Women Voters of North Carolina lives in Precinct G31 in Guilford County, is registered to vote as a Democrat, and regularly votes in Democratic primaries.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on July 10, 2018


Walter L. Salinger