

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

MARCUS CASTER, LAKEISHA
CHESTNUT, BOBBY LEE DUBOSE,
BENJAMIN JONES, RODNEY ALLEN
LOVE, MANASSEH POWELL,
RONALD SMITH, and WENDELL
THOMAS,

Plaintiffs,

v.

JOHN H. MERRILL, in his official
capacity as Alabama Secretary of State,

Defendant.

Case No. 2:21-CV-1536-AMM

**DECLARATION OF LALITHA MADDURI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lalitha Madduri, hereby declare as follows:

1. I am over 18 years of age and am competent to make this declaration. I am a counsel with the law firm of Elias Law Group LLP and one of the attorneys for Plaintiffs in the above-captioned matter.

2. Attached to Plaintiffs' Motion for Preliminary Injunction and Memorandum in Support are the following exhibits:

Exhibit	Document
1	Redistricting guidelines adopted by the Alabama Legislative Committee on Reapportionment on May 5, 2021

2	Expert Report of Maxwell Palmer filed in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 113-79
3	Joint Stipulated Facts for Preliminary Injunction Proceedings in <i>Milligan v. Merrill</i> , No. 2:21-cv-1530-AMM (N.D. Ala.), ECF No. 53
4	Volume 2 of the trial transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 104
5	Volume 3 of the trial transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 105
6	Joint List of Agreed and Disputed Principal Facts filed in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 95
7	Volume 1 of the trial transcript in <i>Chestnut v. Merrill</i> , No. 2:18-cv-907-KOB (N.D. Ala.), ECF No. 103
8	Declaration of Marcus Caster ¹
9	Declaration of LaKeisha Chestnut
10	Declaration of Bobby Lee DuBose
11	Declaration of Benjamin Jones
12	Declaration of Rodney Allen Love
13	Declaration of Manasseh Powell
14	Declaration of Ronald Smith
15	Declaration of Wendell Thomas
16	Motion for Preliminary Injunction, <i>Alabama v. U.S. Dep't of Com.</i> , No. 3:21-cv-211-RAH-KFP (M.D. Ala.), ECF No. 3

3. The exhibits listed above are true and correct copies of what they purport to be.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 15, 2021

/s/ Lalitha Madduri
Lalitha Madduri

¹ To prevent the public disclosure of Plaintiffs' personal information, the publicly-filed versions of Exhibits 8 through 15 contain a redaction of each Plaintiff's residential address. Defendant's counsel has consented to this redaction. Concurrently with this filing, Plaintiffs will provide Defendant and the Court with an unredacted version of these declarations via email.

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I certify that a copy of the foregoing has been served by ordinary U.S. Mail upon all parties for whom counsel has not yet entered an appearance electronically: None.

/s/ Lalitha D. Madduri

Lalitha D. Madduri

Counsel for Plaintiffs