

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

EVAN MILLIGAN, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 2:21-cv-1530-AMM
)	
JOHN H. MERRILL, in his official)	THREE-JUDGE COURT
capacity as Alabama Secretary of State,)	
<i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

DECLARATION OF BRADLEY BYRNE

My name is Bradley Byrne. I represented Alabama's Congressional District 1 in the United States House of Representatives from 2014 through 2021. I am over the age of nineteen, and the facts I have set out below are based upon my personal knowledge.

1. I testified in *Chestnut v. Merrill*, Case No. 2:18-CV-00907-KOB. My deposition and trial testimony from that case is attached. I have reviewed it, and my testimony was truthful and accurate. I have attached to this declaration the transcripts of this testimony along with the referenced exhibits.

2. I understand that new litigation has been filed where plaintiffs propose a congressional map with similar structure to the maps proposed by the plaintiffs in *Chestnut*: a map that splits Mobile County, connecting the areas with more black

voters with Montgomery County and the Eastern Black Belt while connecting the parts of Mobile County with more white voters with counties in southeastern Alabama. The proposed maps in *Chestnut* divided important and longstanding communities of interest in the Gulf Coast counties to connect far-apart voters who do not share a community of interest.

3. My testimony in *Chestnut* about the plaintiffs' proposed maps in that case and the problems the maps present equally applies to any new map with a similar structure.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 22, 2021.

s/ Bradley Byrne
Bradley Byrne