

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

EVAN MILLIGAN, et al.,

Plaintiffs,

vs.

JOHN H. MERRILL, et al.,

Defendants.

No. 2:21-cv-01530-AMM

DECLARATION OF SCOTT DOUGLAS

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I, Scott Douglas, hereby declare as follows:

1. I am over the age of 21 and the testimony set forth in this Declaration is based on firsthand knowledge, information, and belief about which I could and would testify competently in open court if called upon to do so.

2. I am the Executive Director of Greater Birmingham Ministries (“GBM”).

3. GBM was founded in 1969 in response to the challenges posed by the mid-twentieth century Civil Rights movement and its transformative impact in Birmingham, Alabama, and across the United States. It seeks to address urgent human rights and social justice needs in the greater Birmingham area. GBM is a multi-faith, multi-racial, non-profit membership organization that provides emergency services to people in need and engages people to build a strong, supportive, engaged community and a more just society for all people.

4. GBM is dedicated to advancing social justice through political participation across Alabama. It actively opposes state laws, policies, and practices that result in the exclusion of vulnerable groups or individuals from the democratic process. Toward that end, GBM regularly communicates with its members and works to register, educate, and increase voter turnout and efficacy, particularly among Black, Latinx, and low-income people and people with disabilities.

5. GBM has around 5,000 individual members located primarily throughout the greater Birmingham, Alabama area, including Jefferson County and Shelby County. GBM also has members in other areas of Alabama including Mobile, Tuscaloosa, Montgomery, and Madison Counties. Most GBM members are Black registered voters.

6. Members of GBM include Black registered voters who would reside in a remedial second majority-Black district under any of the plans I understand have been proposed by Plaintiffs in this case.

7. GBM also has members who are registered voters who live and vote in congressional districts (“CD”) 1, 2, 3, and 7, which are being challenged in this case.

8. For example, Presdelane Harris is a GBM member who identifies as Black and resides in Montgomery County, Alabama. She is a U.S. citizen and is a lawfully registered voter who resides in CD 2. Under any of Plaintiffs’ remedial plans, Ms. Harris would reside in a second majority-Black district.

9. Alice Paris is a GBM member who identifies as Black and resides in Macon County, Alabama. She is a U.S. citizen and is a lawfully registered voter who resides in CD 3. Under any of Plaintiffs’ remedial plans, Ms. Paris would reside in a second majority-Black district.

10. Ronald Truss is a GBM member who identifies as Black and resides in Jefferson County, Alabama. He is a U.S. citizen and is a lawfully registered voter who resides in CD 7.

11. Frank Barragan is a GBM member who identifies as Latino and resides in Mobile County, Alabama. He is a U.S. citizen and is a lawfully registered voter who resides in CD 1.

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

Executed on December 15, 2021, in Birmingham, Alabama.

A handwritten signature in black ink, appearing to read "Scott Douglas", is written above a horizontal line.

Scott Douglas