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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NATIONAL URBAN LEAGUE; LEAGUE OF WOMEN VOTERS; BLACK ALLIANCE FOR JUST IMMIGRATION; HARRIS COUNTY, TEXAS; KING COUNTY, WASHINGTON; CITY OF LOS ANGELES, CALIFORNIA; CITY OF SALINAS, CALIFORNIA; CITY OF SAN JOSE, CALIFORNIA; RODNEY ELLIS; and ADRIAN GARCIA,

Plaintiffs,

v.

WILBUR L. ROSS, JR., in his official capacity as Secretary of Commerce; U.S. DEPARTMENT OF COMMERCE; STEVEN DILLINGHAM, in his official capacity as Director of the U.S. Census Bureau; and U.S. CENSUS BUREAU,

Defendants.

CASE NO. 20-cv-5799-LHK

DECLARATION OF PAUL WILDEN IN SUPPORT OF PLAINTIFFS' MOTION FOR STAY AND PRELIMINARY INJUNCTION

DECLARATION OF PAUL WILDEN

I, Paul Wilden, hereby declare:

1. I am over the age of 18, have never been convicted of a crime of moral turpitude and am of sound mind and qualified to make this affidavit. I am personally familiar with the facts contained in this affidavit and declare under penalty of perjury pursuant to 28 U.S.C. § 1747 that the statements in this this affidavit are true and correct.

2. I am the Grants Accounting Manager for the Harris County Auditor's Office. My primary job duties include overseeing all accounting and reporting requirements for all Harris County's grants. I have been in my current position for approximately 12 years, and with the Harris County Auditor's Office for 20 years.

3. As part of my official duties, I oversee all accounting related to Harris County's grants. Harris County creates a yearly Comprehensive Annual Financial Report ("CAFR"). Contained within that report is an exhaustive list of Harris County's schedule of expenditures of federal and state grant awards ("SEFA").

4. Based on my review of Harris County's 2019 end of the year SEFA, Harris County expended a total of $155,038,339 federal and state grant awards for the year ended February 2019. The SEFA reflects that Harris County expended federal grants from the U.S. Department of Agriculture, U.S. Department of Housing and Urban Development, U.S. Department of Justice, U.S. Department of Transportation, U.S. Department of Treasury, U.S. General Services Administration, National Aeronautics & Space Administration, National Endowment for the Humanities, Institute of Museum and Library Services, U.S. Department of Health and Human Services, Office of National Drug Control Policy and the U.S. Department of Homeland Security in an amount equal to at least $90,529,359.

5. I have reviewed the working paper entitled *"Uses of Census Bureau Data in*

Federal Funds Distribution: A New Design for the 21st Century" issued in September of 2017 and prepared by Marissa Hotchkiss and Jessica Phelan. The paper outlined all federal grant awards that rely on accurate census data. Based on my review of that material, I estimate that approximately $90,529,359 of the grants expended by Harris County in FY2019 depended on accurate census data.

6. Following the recommendations of the working paper listed above, a non-accurate census count could negatively impact the overall budget of Harris County.

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

Executed on August 24, 2020 in Houston, Texas

Paul Wilden, MBA