

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization on  
behalf of members residing in Georgia;  
SIXTH DISTRICT OF THE  
AFRICAN METHODIST  
EPISCOPAL CHURCH, a Georgia  
nonprofit organization; ERIC T.  
WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State  
of Georgia.

*Defendant.*

**Case No. 1:21-cv-5337**

**DECLARATION OF RAHUL GARABADU**

I, Rahul Garabadu, declare as follows:

1. I am an attorney at the ACLU Foundation of Georgia, Inc., counsel for Plaintiffs ALPHA PHI ALPHA FRATERNITY, INC., SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, ERIC T. WOODS, KATIE BAILEY GLENN, PHIL BROWN, and JANICE STEWART (collectively, “Alpha Plaintiffs”) in the above-captioned matter.

2. Attached hereto as Exhibit A52 is a true and correct copy of Corrected Appendix A to the Report of Dr. Lisa Handley. Exhibit A52 was admitted into evidence, without objection, on February 10, 2022, during the hearing on Plaintiffs’ Motion for Preliminary Injunction. (February 10, 2022, Morning Tr.), Tr. 78:18-20.

3. Attached hereto as Exhibit A53 is a true and correct copy of the Affidavit of Dr. Lisa Handley. Exhibit A53 was admitted into evidence, without objection, on February 14, 2022, during the hearing on Plaintiffs’ Motion for Preliminary Injunction. (February 14, 2022, Morning Tr.), Tr. 5:3-4.

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

/s/ Rahul Garabadu  
Rahul Garabadu

Executed on February 17, 2022 in Atlanta, GA.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Rahul Garabadu

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing ***Declaration of Rahul Garabadu*** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list:

This 17th day of February, 2022.

/s/ Rahul Garabadu