

Exhibit MM

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF LOUISIANA—MONROE DIVISION**

PHILLIP CALLAIS, LLOYD PRICE,)
 BRUCE ODELL, ELIZABETH ERSOFF,)
 ALBERT CAISSIE, DANIEL WEIR,)
 JOYCE LACOUR, CANDY CARROLL)
 PEAVY, TANYA WHITNEY, MIKE)
 JOHNSON, GROVER JOSEPH REES,)
 ROLFE MCCOLLISTER,)

Plaintiffs,

v.

Case No. 3:24-cv-00122

NANCY LANDRY, IN HER OFFICIAL)
 CAPACITY AS LOUISIANA)
 SECRETARY OF STATE,)

Defendant.

**DECLARATION OF HONORABLE GROVER JOSEPH REES, III, IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

My name is Grover Joseph Rees, and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am a non-African American voter who resides in Lafayette, Louisiana and Lafayette Parish.
2. I resided at the same address before SB8 was enacted.
3. Prior to the enactment of SB8, my address was in congressional District 3.
4. SB8 now places my address in District 6.
5. My home, Lafayette, is the core city of “Acadiana,” the historical name given to the French Louisiana region containing much of the State’s French and Spanish populations. Where I reside in Acadiana is largely Catholic and organized around sugar cane farming, fishing,

and, more recently, the oil industry. We have our own unique culture in this region of Southern Louisiana.

6. Shreveport and Baton Rouge, on the other hand, are urban centers whose people have more in common culturally, socially, and economically with Texas and Mississippi, respectively, than with South Louisiana.
7. SB8 arbitrarily severs my neighborhood in Lafayette from the district that has long contained our whole city and parish, and that still includes most members of our community, and by means of a “corridor” places us into a single district with Baton Rouge and Shreveport and other distant areas of the state, with their own distinct cultures and interests, solely on the basis of race.
8. I am registered to vote in the State of Louisiana based upon my current residence and have been registered to vote at this address since at least the time of the congressional elections of 2020 and 2022.
9. I plan to vote in the 2024 congressional election.
10. I have been injured by being placed in District 6 under SB8 predominantly based on race.
11. My personal dignity, and the personal dignity of my neighbors in my new District and my adjoining District(s), have been injured as a result of SB8, in that SB8 racially stigmatizes us, racially stereotypes us, and racially maligns us as citizens who will supposedly make vital decisions as voters based on our race, even though our race is an unchangeable physical characteristic that does not compel our beliefs, our character, our judgments, or our votes.
12. I have also suffered from the State’s discrimination against me based on race in SB8.

13. These personal injuries to me, and my neighbors, arising from the classification of voters by race shall continue if SB8 is allowed to be implemented for the 2024 congressional election cycle.

14. My injury would be redressed if the Court adopted a remedial map that complied with traditional redistricting criteria including compactness, contiguity, and communities of interest.

15. These personal injuries to me, and my neighbors, arising from the classification of voters by race would be eliminated, remedied, and redressed if the Court:

- a. declares SB8 null and void as violative of the Fourteenth and Fifteenth Amendments of the U.S. Constitution, and
- b. adopts a replacement districting plan that complies with our constitutional one-person, one vote requirements, and traditional redistricting criteria, without allowing racial identity of voters to predominate in the configuration of each District.

16. I believe it is imperative that this Court promptly establish a replacement congressional districting plan for the upcoming 2024 election cycle, so that:

- c. I and the other voters of Louisiana have the opportunity to determine the effective boundaries of all the new Districts;
- d. all the possible congressional candidates have the opportunity to determine the boundaries of all the new Districts and to qualify as candidates;
- e. I and the other voters of Louisiana have a reasonable time period to evaluate electoral choices; and
- f. I and the other voters of Louisiana have the time to cast informed votes.

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

Date: February 2, 2024

/s/ 

Grover Joseph Rees, III