UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

PRESS ROBINSON, et al., *Plaintiffs*, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana. *Defendant*.	Civil Action No. 3:22-cv-00211-SDD-RLB
EDWARD GALMON, SR., et al., *Plaintiffs*, v. KYLE ARDOIN, in his official capacity as Secretary of State for Louisiana. *Defendant*.	Civil Action No. 3:22-cv-00214-SDD-RLB

DECLARATION OF PRESS ROBINSON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Dr. Press Robinson, declare as follows:

1. My name is Press Robinson. I am over 18 years of age and am competent to make this declaration. I have personal knowledge of the statements made in this affidavit and each is true and correct.
2. I am Black and a U.S. citizen.
3. I am a resident of the State of Louisiana, and I currently reside in Baton Rouge, Louisiana.
4. I am lawfully registered to vote in Congressional District ("CD") 2.
5. I am a regular voter who votes in federal, state, and local elections. I last voted in the November 2021 election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

Hearing Exhibit
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6. I have always been actively involved in my community and I regularly keep up with the political process. In the 1980s, I was the first Black person to be elected to the East Baton Rouge School Board. I served on the board for over twenty years. I was also the first Black person to be elected president of the School Board. I am a former member of the NAACP. I am currently a participant of Together Baton Rouge and Together Louisiana. These organizations monitor what is happening in my community and around the state of Louisiana.

7. I have followed the current redistricting cycle. I learned about the process through news reports and through conversations with others at Together Baton Rouge and Together Louisiana. I believe that a second majority-Black district is necessary, and that the enacted map, with only one majority-Black district results in the dilution of Black voting strength in Louisiana.

8. I strongly believe that the maps introduced during the legislative session that included two majority-Black districts would better protect my community. The enacted plan packs voters like me in Baton Rouge into the same district as New Orleans. Baton Rouge and New Orleans are distinct communities with distinct needs. New Orleans is a destination city for tourists, whereas tourism is less important to Baton Rouge's economy. New Orleans is also below sea level, and so major disasters are a major concern there. But in Baton Rouge, improving our infrastructure is a major concern. For example, we have been having discussions for almost half a century about the need for a new bridge over the Mississippi River.

9. I am frustrated that the Legislature has enacted a map that packs Black voters in Baton Rouge like me into CD 2 along with those in New Orleans. As a resident of CD 2, the strength of my vote is diluted. The enacted map deprives me of the opportunity to elect a candidate who represents my needs and the needs of my community. It prevents my community and I from being able to advocate effectively for the causes we care about.

10. I declare under penalty of perjury under the laws of Louisiana that the foregoing is true and correct. This Declaration was executed on April 13, 2022.

Press Robinson

Dr. Press Robinson