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 DAVANTE LEWIS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Davante Lewis, declare as follows:

1. My name is Davante Lewis. 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 most recently voted in judicial elections for East Baton Rouge Parish Family Court and Baton Rouge City Court in November 2021. I have endeavored to vote in every

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U.S. congressional election since I qualified to vote in 2010. I intend to vote in future elections, including the upcoming 2022 congressional elections.

6. I am politically active in my community. I am the Director of Public Affairs and Outreach at Louisiana Budget Project. My job primarily is to engage with elected officials and candidates, community members, partner organizations around civic participation and policy. That has kept me very close and deeply involved with upcoming elections, engagement with candidates who are running for office, as well as currently elected individuals. I have done phone-banking, assisted with text drives, and done direct canvassing to voters over elections.

7. I have closely followed the current redistricting cycle since the beginning of the census work, including assisting with census outreach, waiting for census data, paying close attention to reapportionment and redistricting at the state and local level in Louisiana. I attended and provided testimony at the Baton Rouge roadshow. I watched a livestream of every other roadshow stop available on the Legislature's website.

8. As I have been actively involved in work as a policy advocate and throughout the redistricting process, I have come to believe that a second majority-Black district is necessary to ensure that Black voting strength is not diluted.

9. As a collective whole, Black voices are diluted in Louisiana's congressional delegation. Black voters from Baton Rouge are packed into the same congressional district as Black voters from New Orleans, even though we have vastly different needs and make up different communities.

10. I live in the Garden District of Baton Rouge, which borders South Baton Rouge, a predominantly Black area. Because of the way that the congressional districts are drawn, packing Black voters into CD 2, I am not in the same congressional district as my neighbors who live in CD 6. Therefore, while I am in walking distance of Congressman Garret Graves' home, who represents CD6, I am packed into the same congressional district with voters from the lower wards in New Orleans, which is over an hour from my house.

11. Baton Rouge and New Orleans do not need to be in the same congressional districts because they are made up of different communities. For instance, Baton Rouge and New Orleans do not have the same economy. Most people in New Orleans work in hospitality industries, whereas in Baton Rouge, most people work in petrochemical industries.

12. One of the challenges of being packed into the same congressional district as voters from New Orleans is that because New Orleans has more people, their needs are met first. For instance, we need a new bridge in Baton Rouge and would benefit from infrastructure relief, but because New Orleans has more influence due to its size, my congressperson, Representative Troy Carter, focuses more on the infrastructure needs of New Orleans, specifically on using those infrastructure funds to maintain the levee system. I should not have to compete for resources and attention from my elected representative with voters from New Orleans when we do not have the same communities or needs.

13. It is disheartening that the Legislature enacted a map that continues Louisiana's long history of discrimination making it harder for Black people to participate

equally in the political process. I am disheartened that some of the same barriers to voting rights that my great-grandmother and grandmother advocated against continue today. While this country may have come far in certain ways, we still have a long way to go.

14. A second majority-Black district would give Black voters an equal opportunity to elect candidates of their choice. A map with two majority-Black districts is about fair and equal access to representation. Fair representation means that someone is willing to listen to and appreciate my voice and the voice of Black voters in Louisiana. It is not lost on me that we are fighting for an equal opportunity to elect candidates of our choice just as my ancestors before me.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. This Declaration was executed on April 14, 2022.

Davante Lewis