EXHIBIT 4

EXHIBIT

GX-4

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

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

DECLARATION OF CHRISTOPHER J. TYSON IN SUPPORT OF
***GALMON* PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Christopher J. Tyson, hereby declare as follows:

1. I am a professor of law at the Paul M. Herbert Law Center at Louisiana State University, focusing on the areas of property, real estate development, local government law, and urban land use and development. I earned a B.A. in Architecture with honors from Howard University; a Master in Public Policy from the Harvard Kennedy School; and a J.D. from the Georgetown University Law Center.

2. Prior to earning my law degree, I worked in the Washington, D.C. office of former U.S. Senator Mary Landrieu.

3. I was the 2015 Democratic candidate for Louisiana Secretary of State.

4. In my personal experience as a law professor, political candidate, and lifelong Louisianian, I have gained a deep knowledge of the state and its residents.

5. Based on my personal knowledge of and experiences in Louisiana, I firmly believe that a congressional district that includes Baton Rouge and the delta parishes to the north would unite Louisianians with shared economic, historical, and cultural ties.

6. As the state capital, home of Southern University and other educational institutions, and center for the region's petrochemical industry, Baton Rouge serves as the anchor for central Louisiana and its rural parishes, including its Black community. A Baton Rouge-based congressional district that extends north along the Mississippi River simply makes sense.

7. Based on my experiences in the state, I have observed that familial and faith networks link residents of the Baton Rouge area with communities along the Mississippi border. My own family tree reflects this dynamic. My ancestors had their origins in Wilkinson County, Mississippi, just over the Louisiana border on the other side of the river. Members of my family, like many residents of the rural parishes along the Mississippi River, migrated south to the Baton Rouge area for educational and employment opportunities.

8. For example, Baton Rouge's McKinley High School was the only regional high school that Black students could attend during the first half of the 20th century, and the City of Baker formerly included Leland College, which was founded as a college for Black students. Southern University, Louisiana's largest historically Black college or university, is also located in Baton Rouge, as is Louisiana State University.

9. The opportunities that Baton Rouge offered as central Louisiana's urban center created a flow of migrants from the parishes to the north, creating cultural and familial links that continue to this day.

10. These connections reflect Louisiana's history: The state's Black community has historically been tied to the old plantation system and the Mississippi River, which flows along the Louisiana/Mississippi border to Baton Rouge.

11. A Baton Rouge-anchored congressional district that extends north along the Mississippi border would therefore unite communities of shared historical, familial, and economic interests.

Dated: April 15, 2022

Respectfully submitted,

By Christopher Tyson

Christopher J. Tyson