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 DOROTHY NAIRNE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Dorothy Nairne, declare as follows:

1. My name is Dorothy Nairne. 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 Assumption Parish.
4. I am lawfully registered to vote in Congressional District ("CD") 6.
5. I am a regular voter who votes in federal, state, and local elections. Most recently, I voted in the 2020 General Election. I intend to vote in future elections, including the upcoming 2022 congressional elections.

Hearing Exhibit
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6. I am very active in my community. I have attended rallies and town halls, particularly around economic development and environmental justice, because advocating for the health and well-being of my community is highly important to me. In advance of the 2020 decennial census, I served as a Captain of Together Louisiana, a non-partisan organization that advocates for my community. In that capacity, I knocked on doors throughout Napoleonville to encourage my neighbors to fill out their census forms and vote in the 2020 General Election.

7. I studied U.S. History and Black History at my university, so I have long been aware of the ways in which redistricting is used to undermine the power of Black voters. I have followed this redistricting cycle since the 2020 decennial census results were released. I attended redistricting webinars hosted by the Urban League of Louisiana and the NAACP, and I watched the news and read about the legislative session.

8. Because I have been following these updates, I am aware that the total population in my district, CD 6, has increased based on the 2020 census data. I am aware that the enacted plan cracks communities of Black voters like me in a way that prevents the creation of a second majority-Black district and, thus, dilutes my vote. I will suffer irreparable harm because I will be denied the opportunity to elect candidates of my choice, who represents my needs and my interests.

9. My community has very specific needs. Many of my neighbors' families have lived here since enslavement, and the legacy of under-investment in this area continues to this day. My community is rural, has a sizeable Black population, and lacks resources. Our students are under-served, our infrastructure needs

modernization, we lack ready access to fresh groceries, and our economy requires diversification to ensure that our young people have gainful employment opportunities. In the Louisiana Legislature's new congressional map, we are forced to compete for resources and investments with communities that look very different from ours, and that, because they make up the majority of voters in the district, are able to gain the attention of our congressional representative.

10. Enacting a second majority-Black district would lead to many positive changes. It would boost the confidence and sense of self-efficacy of my community. We would be able to get things done, and young people would have more of a reason to stay. Conversations with my neighbors have made it clear to me that my community has lost faith in our political institutions. Being represented by someone who fights for our rights and interests would be a statement to my community that our voices matter. I would feel like the work of my ancestors to ensure that I stand on equal footing with others would finally come to fruition.

11. I have donated to Congressional candidates and I have contacted my Congressman on issues I care deeply about. As a small business owner, I have met with members of my Congressman's Economic Development team for business planning purposes. But I do not believe that my Congressman advocates for my community's needs. As is, I have yet to see my Congressman campaign in my community. Short of when natural disasters strike, we are all but ignored. Because I live in CD 6, my vote is diluted and I am deprived of my right to be heard by a congressperson who represents my interests.

12. I feel angry, paralyzed, and at times helpless knowing that my vote is diluted. If the enacted map remains in place, it will diminish my ability to advocate for the things I care deeply about, such as environmental, socioeconomic, and racial justice. Through my advocacy, I am aware that I do not get equal access to my Congressional representative when compared to other voters in my district. I am also keenly aware that I have to work harder to get the attention of my Congressperson compared to voters in other districts. This is not fair, and at times it feels debilitating.

13. I am a person of action. I want to make sure my choices are meaningful and propel my community forward. As a Black woman whose family fought for the right to vote, the efficacy of my vote deeply matters to me. My parents faced every hurdle imaginable to make sure their voices were heard and to carve out a better life for their children. I am committed to doing the same for the next generation. I want to see my community rise and the only way it can is if our voices are heard.

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

Dr. Dorothy Nairne