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 MARTHA DAVIS IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Martha Davis, declare as follows:

1. My name is Martha Davis. 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 have voted in every U.S. congressional election that I can remember. I intend to vote in future elections, including the upcoming 2022 congressional elections.

Hearing Exhibit
PR-8
3:22-cv-00211-SDD-RLB

6. I am politically active in my community. I regularly volunteer with Together Baton Rouge, particularly on issues I care deeply about. For example, I have written to my Congressperson, phone-banked, or talked to my friends and neighbors about fighting for sensible gun control measures and combatting violence in East Baton Rouge, ensuring access to clean water for my community, ending homelessness, and expanding fresh food initiatives. Last year, I knocked on doors to help pass a tax to support the bus transit system in Baton Rouge. I also recently made calls to ask people to vote against Amendment 5's industrial tax exemptions.

7. As a member of AARP, I write letters to legislators, including my Congressperson, about issues such as keeping Social Security solvent, supporting affordable healthcare, and bolstering consumer protection.

8. I have followed the current redistricting cycle with great interest. I watched the Baton Rouge Road show. I have spoken with my family about redistricting. I have come to believe that a second majority-Black district is necessary to ensure that Black voting strength is not diluted.

9. The enacted map packs Black voters like me in Baton Rouge into the same district as New Orleans. Baton Rouge voters like me should not be forced to compete with New Orleans voters for airtime and resources. Our needs are vastly different. For example, investments in New Orleans understandably must focus on natural disaster relief. But in Baton Rouge, we need very different things, such as investments in improving Interstate 10, building another bridge over the Mississippi River, and adding more lanes to our roads to alleviate the heavy

traffic caused by our recent population boom. Our cities should not have to compete for the attention of the same congressional representative.

10. As a resident of CD 2, the strength of my vote is diluted. This prevents me from being able to advocate effectively for the causes I care about.

11. If a second majority-Black district were enacted, I would feel hopeful. A lot of people I know feel there is no point in voting because they believe it does not make a difference. To get things done, you have to believe change is possible. When Barack Obama became President, we saw more Black people at the polls that ever before, because he made us feel that we mattered. If we had fair representation, my community would have the hope that is a necessary to make change happen.

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

Martha Davis