

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

**DECLARATION OF QIZHOU GE IN SUPPORT OF *WILLIAMS* PLAINTIFFS'
MEMORANDUM IN OPPOSITION TO LEGISLATIVE DEFENDANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Qizhou Ge, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18 and competent to make this declaration. I am an associate with the law firm Elias Law Group LLP and am admitted to practice law in the State of Maryland and the District of Columbia and before multiple federal courts of appeals and district courts. I have been admitted pro hac vice before this Court. I serve as counsel for *Williams* Plaintiffs in the above-captioned matter.

2. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of *Williams* Plaintiffs' Memorandum in Opposition to Legislative Defendants' Motion for Partial Summary Judgment.
3. **Exhibit 1** is a true and correct copy of the declaration of Shauna Williams, dated January 3, 2025.
4. **Exhibit 2** is a true and correct copy of the declaration of Flor Herrera-Picasso, dated January 3, 2025.
5. **Exhibit 3** is a true and correct copy of the declaration of James Adams, dated January 3, 2025.
6. **Exhibit 4** is a true and correct copy of the declaration of Luciano Gonzalez-Vega, dated January 3, 2025.
7. **Exhibit 5** is a true and correct copy of the declaration of Allison Shari Allen, dated January 3, 2025.
8. **Exhibit 6** is a true and correct copy of the declaration of Laura McClettie, dated January 3, 2025.
9. **Exhibit 7** is a true and correct copy of the declaration of Nelda Leon, dated January 3, 2025.
10. **Exhibit 8** is a true and correct copy of the declaration of German De Castro, dated January 3, 2025.
11. **Exhibit 9** is a true and correct copy of the declaration of Alan Rene Oliva Chapela, dated January 3, 2025.

12. **Exhibit 10** is a true and correct copy of the declaration of Virginia Keogh, dated January 3, 2025.

13. **Exhibit 11** is a true and correct copy of the declaration of Natalee Nanette Nieves, dated January 3, 2025.

Dated: January 7, 2025

By: /s/ Qizhou Ge

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** Special Appearance pursuant to
Local Rule 83.1(d)*

EXHIBIT 1

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

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official capacity as Chair of the House Standing
Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

NORTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,

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PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF SHAUNA WILLIAMS

I, Shauna Williams, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Shauna Williams. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Black citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Warrenton in Warren County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 1.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 1.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

Shauna Williams

Shauna Williams

EXHIBIT 2

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

Plaintiffs,

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REPRESENTATIVE DESTIN HALL, in his
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PHILIP BERGER, in his official capacity as the
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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF FLOR HERRERA-PICASSO

I, Flor Herrera-Picasso, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Flor Herrera-Picasso. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latina citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Wilson in Wilson County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 1.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 1.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

Flor Herrera-Picasso

Flor Herrera-Picasso

EXHIBIT 3

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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PHILIP BERGER, in his official capacity as the
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Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF JAMES ADAMS

I, James Adams, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is James Adams. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Black citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of High Point in Guilford County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 6.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 6.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

James Adams

James Adams

EXHIBIT 4

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF LUCIANO GONZALEZ-VEGA

I, Luciano Gonzalez-Vega, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Luciano Gonzalez-Vega. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latinx citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Greensboro in Guilford County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 6.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 6.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

Luciano Gonzalez-Vega _____
Luciano Gonzalez-Vega

EXHIBIT 5

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF ALLISON SHARI ALLEN


I, Allison Shari Allen, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Allison Shari Allen. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Black citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Charlotte in Mecklenburg County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 12.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025



Allison Shari Allen

EXHIBIT 6

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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REPRESENTATIVE DESTIN HALL, in his
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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF LAURA MCCLETTIE

I, Laura McClettie, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Laura McClettie. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Black citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Charlotte in Mecklenburg County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 12.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

 _____
Laura McClettie

EXHIBIT 7

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF NELDA LEON

I, Nelda Leon, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Nelda Leon. I am competent to testify and declare the following facts
based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latina citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Charlotte in Mecklenburg County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 12.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

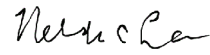

Nelda Leon

EXHIBIT 8

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Civil Action No. 23 CV 1104

DECLARATION OF GERMAN DE CASTRO

I, German De Castro, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is German De Castro. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latino citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Charlotte in Mecklenburg County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 12.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

German De Castro _____
German De Castro

EXHIBIT 9

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF ALAN RENE OLIVA CHAPELA

I, Alan Rene Oliva Chapela, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Alan Rene Oliva Chapela. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latino citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Gastonia in Gaston County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 14.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

Alan Rene Oliva Chapela

Alan Rene Oliva Chapela

EXHIBIT 10

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF VIRGINIA KEOGH

I, Virginia Keogh, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Virginia Keogh. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Black citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Charlotte in Mecklenburg County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 14.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025



Virginia Keogh

EXHIBIT 11

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

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Defendants.

Civil Action No. 23 CV 1104

DECLARATION OF NATALEE NANETTE NIEVES

I, Natalee Nanette Nieves, pursuant to 28 U.S.C. § 1746, hereby state:

1. My name is Natalee Nanette Nieves. I am competent to testify and declare the following facts based on my personal knowledge.
2. I am a plaintiff in the above-captioned case.
3. I am a Latina citizen of the United States and of the State of North Carolina.
4. I am a registered voter and resident of Gastonia in Gaston County.

5. Under the 2022 Congressional Plan, I was a registered voter in Congressional District 14.
6. Under the 2023 Congressional Plan, I am a registered voter in Congressional District 14.
7. I intend to vote in future congressional elections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2025

Natalie Nieves _____
Natalie Nieves