

**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 BARBARA SUTTON**

October 31, 2025

I, Barbara Sutton, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. My name is Barbara Jean Sutton. I live in Kinston, North Carolina. I have lived in Lenoir County all my life.
2. I identify as Black.
3. I am registered to vote and am a longtime voter in Lenoir County. Since 2023, I have resided and voted in Congressional District 1 (CD 1). I now reside in Congressional District 3 (CD 3) because SB 249 moved me from CD 1 to CD 3.
4. I intend to vote in Lenoir County in the future.
5. In the 2024 general election, I voted for Congressman Don Davis to represent CD 1 and former Vice President Kamala Harris for President.
6. I have been a member of the North Carolina State Conference of the NAACP since 2015. I have been the President of the Kinston Lenoir Chapter of the NAACP since 2019. I also serve on the Executive Committee of the North Carolina State Conference of the NAACP.
7. I know Congressman Davis and have seen his responsiveness to constituents firsthand. He does not always agree with every constituent, and not every constituent always agrees with him, but he listens to our communities.
8. Congressman Davis has spent extensive time meeting constituents in Lenoir County, including at MLK Day and Juneteenth events. He makes a concerted effort to listen to the concerns of people in Lenoir County, and believes in the importance of engaging with youth, who represent our future.
9. I was invited to an event organized by Democracy North Carolina, where Congressman Davis listened to constituents' concerns about the SAVE Act, which was legislation Congress was considering that would have made it harder for many of us to vote. I listened to my neighbors share personal life stories to convey how

the SAVE Act would impact them, because many people do not have a birth certificate or similar documentation that matches their current legal name. Congressman Davis made clear before that meeting that he was planning to vote in favor of the SAVE Act. He ultimately voted against it, and I believe hearing directly from constituents was a big reason why. It was only because Congressman Davis was receptive to hearing our perspectives and took the constituents' concerns seriously that he voted to protect our civil rights in a major bill before Congress.

10. I have also attended a meeting organized by Congressman Davis for faith leaders in Congressional District 1, because he was seeking input on how to better serve faith-based communities.
11. As the President of the Kinston Lenoir Chapter of the NAACP, I have done extensive organizing to register, inform, and activate voters. Among our many nonpartisan voter education activities are regular candidate forums, family political nights, and the Do You Know campaign that we facilitate in the lead up to each election. Together with other NAACP members, I also help people exercise their right to vote through rides to register and rides to the polls.
12. My work with the NAACP to educate and activate voters has extended beyond Lenoir County to other neighboring counties in CD 1. For example, I work with Eastern North Carolina (ENC) Blueprint, a group of community organizers that meets twice a month to strategize on voter education and other pro-democracy initiatives. I have exchanged resources on voter education with people involved in ENC Blueprint, which has helped us all serve our communities. Through ENC Blueprint and the A. Philip Randolph Institute, I have built ties with other organizers and advocates in what used to be CD 1.
13. Because SB 249 moves Lenoir County into CD 3, my network of connections with other community advocates in the Black Belt region of what used to be CD 1 is severed. I will now have to change who I work with on a consistent basis and reach

out to form new connections in CD 3 to advocate for NAACP members and other people in Lenoir County.

14. In addition, other NAACP members and I will now have to travel further to get to counties in the southern part of CD 3 for voter registration, education, and get-out-the-vote efforts. Transportation is a significant barrier to mobilizing members of the Kinston Lenoir NAACP Chapter. It will be difficult for us to engage in get-out-the-vote efforts in parts of CD 3 that are hours away.

15. I am familiar with Congressman Greg Murphy, who represents CD 3, through news reporting. I have not built coalitional or personal relationships with him, as I have with Representative Davis. The same is true for many members of our NAACP chapter in Lenoir County.

16. SB 249 makes it harder to engage with voters who now think it is a waste of time to vote. Instead of voters choosing their representatives, there is an understanding that the line chooses them, which is made worse by SB 249.

17. I believe SB 249 was passed to show the power of the General Assembly over the people of North Carolina. Part of the NAACP's mission is to speak out against injustice. SB 249 is an effort to punish Black voters for speaking out against injustice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: October 31, 2025

A handwritten signature in cursive script, reading "Barbara Jean Sutton". The signature is written in dark ink and is positioned above a horizontal line.

Barbara Jean Sutton