

**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 COURTNEY MURRAY PATTERSON

October 31, 2025

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

1. I testified during the trial in this matter as a fact witness on June 18, 2025. All of my previous testimony is still true and correct to the best of my knowledge. I am now a Plaintiff in this matter.

2. I reside at 1105 Patterson Road, Kinston NC 28504, in Lenoir County. I have resided at this residence since 1978. I reside in current Congressional District 3.

3. I identify as Black/African American.

4. I have been registered to vote and regularly voting in the state of North Carolina since 1970.

5. Voting is important to me because we as a people in a democracy are and should be obligated to choose our elected officials. In my personal capacity and through my roles with the NC NAACP, Blueprint NC, and the Lenoir County Board of Elections, I have spent my life encouraging other members of my community in Eastern North Carolina to go vote. For the last sixty years I have done everything I can to register new voters, increase voter participation, and help voters understand the importance of fighting against suppressive measures designed to inhibit their ability to elect a candidate of their choice.

6. In the 2024 General Election, for the first time in my life, I voted in Congressional District 1. I cast my votes in that Election for Representative Don Davis and former Vice President Kamala Harris. Prior to 2024, I had been in Congressional District 3 for as long as I can remember, aside from a brief period of time when I was in Congressional District 7.

7. I have known Rep. Davis for many years, since his time as mayor of Snow Hill and through his time in the North Carolina General Assembly representing Pitt and Greene County. Over the years, through my work organizing in Eastern North Carolina, we have had various conversations on a variety of bills and developed a positive working

relationship. While I do not always see eye to eye with Rep. Davis on every issue, my impression is that he has been receptive to the needs of the Black communities he has represented.

8. In the short time that I was his constituent in CD 1, I was able to band together with my fellow constituents to lobby Rep. Davis to win his support on issues important to our community. A notable example of this is the work we were able to do regarding the SAVE Act (a piece of federal legislation that would make voting more difficult). I was able to get Rep. Davis on the phone fairly quickly to hear about his position, and shortly thereafter I helped to coordinate a zoom gathering with many of his close constituents to voice our opposition to the Act. When, walking away from that zoom gathering, his position in opposition to the SAVE Act still had not solidified, we were able to coordinate a calling campaign reaching about 17,000 of Rep. Davis's constituents, and additionally, about 140 calls were made directly his office in opposition to the bill. Ultimately, Rep. Davis voted in opposition to the SAVE Act. This effort may not have been as effective with a different representative who was not as invested in my community's values.

9. Now, only two years after the latest congressional redraw, I have been moved back into CD 3. While this move will not erode the relationships I have built over my lifetime in Eastern North Carolina, I will once again be advocating with Rep. Davis as an outsider, rather than a constituent.

10. While I am somewhat familiar with Representative Greg Murphy as a doctor from my community, I did not elect him. We do not have a relationship, and nothing I know about him makes me believe that that he will be responsive to the needs of my community.

11. I know from my extensive organizing work that during the last congressional redraw, many members of my community and our surrounding counties were deeply confused and dismayed by the sudden change of their district lines and representatives. They did not know what candidates were on their ballot or what information to look to. It took a lot of work to get voters familiar with the correct candidate. I know this re-education

work will have to happen again. Therefore, during the short 2025 redistricting process, I prioritized holding a virtual community meeting to bring public awareness to the redistricting process that was taking place rather than advocating against the plan directly with the General Assembly, and I have continued this community work since.

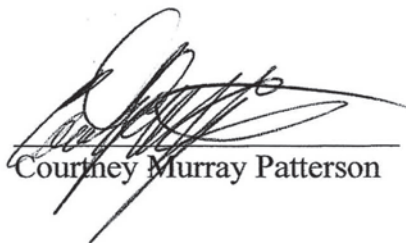
12. Through the conversations that I have had in my community since the mid-decade redraw and through my years of experience, I know that all of this work that voters have to undertake to wrap their head around what district they are in and who even represents them distracts from the issues that they care about and creates voter apathy.

13. I feel that this keeps happening by design – the General Assembly has targeted my area of the state for this mid-decade redraw in order to confuse and discourage people, and I believe that is happening as a punishment for the views they have expressed with their vote. It is going to take a lot more energy to try to overcome this discouragement in my GOTV efforts than would have been necessary had we not been targeted in this way.

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:

10/31/25



Courtney Murray Patterson