

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

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE HUGH BLACKWELL, in
his official capacity as Chair of the House
Standing Committee on Elections, 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

**SECOND DECLARATION OF LALITHA D. MADDURI IN SUPPORT OF
WILLIAMS PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lalitha D. Madduri, 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 a partner with the law firm Elias Law Group LLP and am admitted to practice law in the States of California and Arizona and the District of Columbia and before the United States Supreme Court, as well as multiple federal courts of appeals and district courts. I serve as counsel

for *Williams* Plaintiffs in the above-captioned matter. I have appeared by special appearance pursuant to Local Rule 83.1(d) in this case.

2. I submit this second declaration to provide the Court with true and correct copies of materials submitted in support of *Williams* Plaintiffs' Motion for Preliminary Injunction. ECF No. 187.

Exhibit 15 is a true and correct copy of Legislative Defendants' Objections and Responses to *Williams* Plaintiffs' First Set of Interrogatories, dated May 24, 2024.

Exhibit 16 is a true and correct copy of the Supplemental Expert Rebuttal Report of Dr. Allan J. Lichtman, dated November 18, 2025.

Exhibit 17 is a true and correct copy of the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 18, 2025.

Exhibit 18 is a true and correct copy of the Second Supplemental Rebuttal Report of Dr. Maxwell Palmer, dated November 17, 2025.

Dated: November 18, 2025

PATTERSON HARKAVY LLP

Narendra K. Ghosh, NC Bar No. 37649
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
nghosh@pathlaw.com

Counsel for Williams Plaintiffs

ELIAS LAW GROUP LLP

By: /s/ Lalitha D. Madduri
Lalitha D. Madduri*
Lucas Lallinger*
Qizhou Ge*
James J. Pinchak*
250 Massachusetts Ave., Suite 400
Washington, D.C. 20001
Phone: (202) 968-4490
Facsimile: (202) 968-4498
LMadduri@elias.law
LLallinger@elias.law
AGe@elias.law
JPinchak@elias.law

Abha Khanna*
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
AKhanna@elias.law

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