

**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

**THIRD 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 third 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 19 is a true and correct copy of the Corrected Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 20, 2025.

Exhibit 20 is a true and correct copy of a redline showing the corrections made in the Corrected Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 20, 2025.

Exhibit 21 is a true and correct copy of the Errata to the Supplemental Expert Rebuttal Report of Dr. Jonathan Rodden, dated November 20, 2025.

Dated: November 20, 2025

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