

Exhibit P to
Hale v. Lee Motion for Temporary Restraining
Order and Preliminary Injunction

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

**VICKI HALE, EARLE FISHER,
TELISE TURNER, HEDY WEINBERG,
STEPHEN COHEN, CHAZ
MOLDER, CHANEY MOSLEY,
JUSTIN PEARSON, and the TENNESSEE
DEMOCRATIC PARTY,**

Plaintiffs,

v.

**BILL LEE, Governor,
TRE HARGETT, Secretary of State;
MARK GOINS, Tennessee Coordinator of
Elections; all in their official capacity only,**

Defendant.

CASE NO. _____

DECLARATION OF HEDY WEINBERG

I, Hedy Weinberg, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct based on my personal knowledge:

1. I am over the age of eighteen (18), of sound mind, and competent to testify to the matters set forth herein.
2. I am a resident and registered voter of Davidson County, Tennessee.
3. I am engaged in civic activities and I am politically active.
4. For more than three decades, I served as executive director of the American Civil Liberties Union (“ACLU”) of Tennessee. In that role, I exercised my First Amendment speech rights, and I advocated for the protection of those rights for all. I am now retired.
5. I am a regular voter, and I have specifically voted in congressional elections, including primary elections to elect party nominees for congressional elections.

6. As executive director of the ACLU of Tennessee, I refrained from political involvement in campaigns. However, now that I am retired, I have become more active in those types of efforts and causes.
7. In 2026, I have been particularly involved in Chaz Molder's campaign for the Democratic Party's nomination to run in Tennessee's 5th Congressional District against the Republican nominee. I have contributed to his campaign financially. I have talked with voters about why I am supporting him politically in this race. I have even organized and hosted campaign events for Mr. Molder in Nashville.
8. I became involved in Mr. Molder's campaign because I have resided in what the Tennessee General Assembly approved as within the geographic boundaries of the 5th Congressional District in 2022. For years, the 5th Congressional District covered most of, if not all of, Davidson County, but in 2022 it was redrawn. As a result of the Tennessee General Assembly's actions in 2022, Davidson County was divided into three congressional districts, and the 5th Congressional District (where I live) was one of those districts.
9. After the 2022 redistricting, the 5th Congressional District changed from a district that was heavily Democratic to one that favored Republicans. In 2026, I decided to become more active in Mr. Molder's campaign because I believed that he was a candidate who could win this Congressional District, and that this was an election cycle that would favor his campaign efforts and political viewpoint.
10. Yet another reason I have been meaningfully involved in supporting Mr. Molder's campaign is that I expected his opponent to be Congressman Andy Ogles in the general election. My views are very much different than Congressman Ogles' views, and I was eager to use my voice, resources,

and time to advance the candidacy of Mr. Molder who I believe could win more votes in support of his candidacy than Congressman Ogles could win.

11. I am very disturbed that this week the Tennessee General Assembly has approved new geographic boundaries for Tennessee's congressional districts, including the 5th Congressional District. I understand that I no longer reside in the 5th Congressional District. I am not completely certain which congressional district I reside in now.
12. I believe my campaign efforts for the previously drawn 5th Congressional District that Mr. Molder qualified to run in and has been campaigning may have been wasted or at least directed towards voters who will be unable to vote in this election.
13. I understand that the Tennessee General Assembly has not only changed the geographic boundaries of the congressional district, including the 5th Congressional District where I have been active in a campaign, but also has implemented new qualifying deadlines for candidates to qualify and then run in these newly drawn districts. To be active and involved in a congressional campaign in a new district, I'll have to learn about the candidates and I'll need to take action to figure out how to associate and support a new candidate for a new district where I reside.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7 day of May, 2026.

Hedy Weinberg
Hedy Weinberg