

Exhibit U 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. _____

JUDGE _____

DECLARATION OF REPRESENTATIVE JUSTIN J. PEARSON

I, Justin J. Pearson, 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. I am a resident and registered voter of Shelby County, Tennessee, and I am a duly announced and qualified candidate for the United States House of Representatives for Tennessee's 9th Congressional District in the August 6, 2026 federal primary election. I am currently the elected representative for Tennessee House of Representatives District 86 which covers portions of Shelby County. I make this Declaration in support of Plaintiffs' Motion for a

Temporary Restraining Order and Preliminary Injunction. The facts stated herein are based on my own personal knowledge.

2. I publicly announced my candidacy for the 9th Congressional District in the fall of 2025 and have been actively campaigning continuously since that time. From the moment I launched my campaign, every strategic, financial, and organizational decision I made was premised on the boundaries of the 9th Congressional District as enacted by the Tennessee General Assembly following the 2020 Census and as in effect throughout the 2024 election cycle (the "2024 Map"). Under the 2024 Map, the 9th Congressional District is anchored in and principally consists of Shelby County, including the City of Memphis, and that geographic configuration has defined the universe of voters I sought to represent, the issues I prioritized, the coalitions I built, and the resources I deployed.

3. I timely filed my qualifying petition with the Tennessee Secretary of State to appear on the August 6, 2026 primary ballot for the 9th Congressional District before the statutory qualifying deadline of noon on March 10, 2026, as required by Tenn. Code Ann. § 2-5-101(a)(1). My petition contains the signatures of qualified voters who reside within the 9th Congressional District as drawn under the 2024 Map. Those signatures were collected by my campaign based on the addresses of registered voters within Shelby County and the limited portions of adjacent counties included in the 9th Congressional District under the 2024 Map. To my knowledge, my petition was accepted, my signatures were verified, and I was certified as a qualified candidate for the 9th Congressional District by the appropriate election officials.

4. Since announcing my candidacy in the fall of 2025, my campaign has engaged in sustained, direct voter contact within the 9th Congressional District as drawn under the 2024 Map. My campaign and I have personally knocked on doors, made phone calls and text

messages, attended community forums, neighborhood meetings, civic association gatherings, and faith community events, and held in-person meet-and-greets across Shelby County and the small adjoining areas included in the 9th Congressional District. Every voter list we reviewed, every walk packet we printed, every phone bank script we used, and every targeting model we built was generated using the precinct and block boundaries of the 9th Congressional District as it has existed since the 2022 redistricting cycle.

5. My campaign has raised significant funds from contributors who supported my candidacy specifically because I was running to represent the 9th Congressional District as currently constituted, principally including Shelby County and the City of Memphis. Many of my donors are themselves residents of the existing 9th Congressional District; many others, both inside and outside Tennessee, contributed because of my stated intention and ability to represent the particular community of interest reflected in the existing district—a district with a deep civil-rights history, a unique economic profile centered on Memphis, and longstanding political, cultural, and social ties throughout Shelby County. Every contribution solicitation I have signed, every fundraising email my campaign has sent, every pitch I have made to donors, and every campaign finance report I have filed with the Federal Election Commission has been premised on, and reported, a candidacy in the 9th Congressional District as drawn under the 2024 Map.

6. The infrastructure of my campaign is likewise built entirely around the existing 9th Congressional District. I have hired and trained paid campaign staff and consultants, recruited and organized hundreds of volunteers from neighborhoods within the district, secured endorsements from elected officials, organizations, and community leaders whose constituencies lie within the existing district, and developed policy platforms responsive to the specific needs of Shelby County and Memphis residents. These commitments represent months of work and

substantial financial expenditures, all of which were made in reliance on the 2024 Map and the configuration of the 9th Congressional District as principally encompassing Shelby County.

7. The Tennessee General Assembly has enacted legislation that redraws Tennessee's congressional district boundaries after the qualifying deadline for the August 6, 2026 primary has already passed. I have reviewed the boundaries of the new 9th Congressional District as set forth in the challenged legislation. The new map dramatically alters the 9th Congressional District by carving Shelby County into multiple congressional districts and joining the remaining portion with substantial territory in counties far removed from Memphis. As a result, a significant portion of the voters whose doors I have knocked, whose calls I have returned, whose contributions I have received, and whose support I have spent more than half a year cultivating no longer reside in the district for which I qualified to run.

8. The mid-cycle redistricting causes my campaign concrete, immediate, and irreparable harm. The voter contact data my campaign has built—including identified supporters, voter targets, volunteer lists, and donor relationships—is now of greatly diminished value because much of it pertains to voters drawn out of the redrawn 9th Congressional District. The time spent developing direct mail, digital advertising, and paid media I had planned to purchase and deliver to voters within the existing 9th Congressional District cannot be recovered, and any further communication will require new geographic targeting, new lists, new creative, and new vendor expenditures—at a time when fewer than ninety days remain before the August 6, 2026 primary.

9. The mid-cycle redistricting also re-opens the qualifying deadline for the 9th Congressional District, allowing new candidates who had not previously had an active campaign to now join the race. These new candidates will need to be researched and my policy and voter

contact will have to change if new candidates are now allowed to enter the race. The voter contact data my campaign has built—including identified supporters, voter targets, volunteer lists, and donor relationships—is now of greatly diminished value because much of it pertains to voters drawn out of the redrawn 9th Congressional District and relates to my anticipated opponent based on the 2024 Map. In effect, the new map and new candidates forces me to restart a campaign I have been waging for more than six months, with money I have already spent and cannot recoup, and with a fraction of the time I had originally planned to introduce myself to voters.

10. The mid-cycle redistricting also severs my associational relationship with the voters and supporters who have invested their time, money, and trust in my candidacy. Voters who circulated my petitions, donated to my campaign, hosted house parties on my behalf, posted yard signs, and committed to vote for me on August 6, 2026 will, under the new map, find themselves placed in a different congressional district where my name will not appear on their ballot, or alternatively will be told that the candidate they qualified to support is no longer running in the same race they had been preparing to vote in. For all the foregoing reasons, I respectfully ask this Court to enter a temporary restraining order and preliminary injunction barring Defendants from implementing the newly enacted congressional map for the 2026 election cycle and ordering that the August 6, 2026 primary election proceed under the 2024 Map under which I and other candidates have qualified, campaigned, and competed.

SIGNATURE ON FOLLOWING PAGE

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

Executed this 7th day of May, 2026, in Shelby County, Tennessee.

Signed by:

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Justin J. Pearson