

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

VICKI HALE, EARLE FISHER,)	
TELISE TURNER, HEDY WEINBERG,)	
STEPHEN COHEN, CHARLES ‘CHAZ’)	
MCIVER MOLDER, CHANEY)	
MOSLEY, JUSTIN PEARSON, and the)	
TENNESSEE DEMOCRATIC PARTY,)	
)	
<i>Plaintiffs,</i>)	CASE NO. 3:26-cv-00603
)	
v.)	JUDGE CAMPBELL
)	
BILL LEE, Governor,)	
TRE HARGETT, Secretary of State;)	
MARK GOINS, Tennessee Coordinator)	
of Elections; all in their official capacity)	
only,)	
)	
<i>Defendants.</i>)	

DECLARATION OF TIFFANY PERKINS

I, Tiffany Perkins, 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 Commissioner on the Montgomery County Election Commission (“MCEC” or the “Commission”).
3. Prior to last Thursday, Montgomery County was fully contained within the seventh (7th) congressional district. As a result of last Thursday’s redistricting, Montgomery County is now split between the fifth (5th) and seventh (7th) congressional districts.

4. While the process of implementing changes to ballots, GIS maps, precincts, and identifying (and potentially remedying) split precincts is already underway, it is entirely unclear how the Commission is going to be able to comply with the new map. In particular, I am extremely concerned that the Commission will be unable to prepare all the ballot permutations by the statutory deadline.

5. It will be an all-hands-on-deck process to try to implement the new map in Montgomery County. Commission staff is analyzing the new map to determine its impact on the election process and will have to update internal databases and other resources before we can even think about updating public-facing websites and notifying voters of the changes, if that will even be possible.

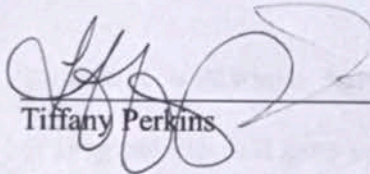
6. Ordinarily, county election commissions have many months to implement changes and to make sure the ballots they publish and give to voters reflect new district lines. This is a meticulous, time-consuming, iterative process involving multiple cross-checks and safeguards. In particular, mapping and balloting software must be carefully checked to ensure each voter in a precinct divided across two or more congressional district receives the correct ballot.

7. Under the newly enacted redistricting, I do not believe that voters will receive direct notice of their updated congressional district, given that the new law passed by the General Assembly abrogates the statutory notice requirement only for this election. In 2022, for example, registered voters in our county received postcards informing them of their new congressional and state election districts. At this point, I think it is unlikely that the Commission will be able to get such postcards printed and distributed in time for the August 6th primary, given the extraordinary amount of work there is to be done before such postcards can be finalized, printed, and mailed.

8. If voters do not receive such notice, I am confident that the November 2026 election will see mass and unprecedented voter confusion and substantially interfere with the ability of Montgomery County voters to exercise their fundamental right to vote. Candidly, even if voters do receive such notice, I believe that there will still be substantial confusion and effective voter disenfranchisement based on the considerable changes to the election map and the concomitant changes to ballots, precincts, and voting locations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10 date of May, 2026.


Tiffany Perkins

Dated: May 10, 2026

Respectfully submitted,

/s/ David W. Garrison

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this *Declaration of Tiffany Perkins* was filed electronically with the Clerk's office and served upon Defendants using the Court's CM/ECF system on May 10, 2026, through their counsel of record as indicated below:

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/s/ David W. Garrison

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