

# EXHIBIT

## 3



**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**VICKI HALE, EARLE FISHER, TELIZE TURNER, )  
HEDY WEINBERG, STEPHEN COHEN, CHARLES )  
'CHAZ' MCIVER MOLDER, CHANEY MOSLEY, )  
JUSTIN PEARSON, and the TENNESSEE )  
DEMOCRATIC PARTY, )**

**Plaintiffs,**

**v.**

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

**Defendants.**

**No. 3:26-cv-00603  
Chief Judge Campbell**

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**DECLARATION OF WILL BURNS**

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I, WILL BURNS, declare the following:

1. I am over the age of eighteen, and I am competent to testify on the matters set forth herein.
2. I am the Chairman of the Davidson County Election Commission ("DCEC"). I previously served as the Coordinator of Elections for the State of Tennessee, and in that role, I oversaw the administration of Tennessee elections and worked with county election commissions statewide.
3. The DCEC will be able to create all the versions of the ballot needed for the August election. Through a collaborative effort between the Davidson County Election Commission, the Metro Nashville GIS Team, and the Tennessee Comptroller of the Treasury team, we are working through the following steps to ensure that all voters in Davidson County are assigned to the correct U.S. Congressional district, based on their home address. Those steps are as follows:

**Step 1: GIS Data Entry and District Boundary Mapping** – Our team has imported the new U.S. Congressional district shapefiles into GIS software and is aligning all precinct and voter address layers with the redrawn boundaries.









**Step 2: Voter Registration Database Update** – Our team will next import the updated street and district file into the PowerProfile voter database and reassign all affected voters to their new U.S. Congressional districts.

**Step 3: Accuracy Reviews** – Steps 1 and 2 will be repeated until 100% of all registered voters in Davidson County are assigned to the correct U.S. Congressional district.

4. Split precincts existed under the previous U.S. Congressional district map, and Under the new U.S. Congressional district map, there are 347 split precincts. Ballots will be created based on the number of split precincts in Davidson County. Of those split precincts, 44 are new split precincts resulting from the 2026 congressional redistricting. The DCEC will be able to handle this number of new split precincts.
5. The DCEC will be able to timely notify voters of their precinct changes. All registered voters in Davidson County affected by the redistricting will receive a new voter registration card. The vendor who will print and mail these cards has been scheduled to complete the job no later than the first week of July.
6. The DCEC will be able to update its website with the information about new congressional districts. The Davidson County Election Commission website ([nashville.gov/vote](https://nashville.gov/vote)) has links to the Secretary of State's website (<https://sos.tn.gov/announcements/2026-congressional-redistricting>) with information about the redistricting. The link to this information is titled "2026 Congressional Redistricting Information" and appears at three locations on the DCEC website. These can be found as follows: From the DCEC homepage click on the "Find 2026 Election Information" tab. A link to "2026 Congressional Redistricting Information" can be found in two locations—at the top of the new page as well as under the heading "August 6, 2026: State & Federal Primary, County General, Oak Hill Municipal Election" found on that same page. The third location is found by clicking on the "Navigation" tab, from there click on "Candidates," and the redistricting link is at the top of the "Candidates for Elected Office Information" page.
7. The funds appropriated by the Tennessee General Assembly have provided the DCEC with financial flexibility to create a special redistricting team with DCEC employees and focus their work on the completion of this project, including any necessary overtime work. The appropriated funds have also been used to temporarily replace some members of the special redistricting team with seasonal employees to keep our election planning activities on schedule. With this financial support, we are confident we will be able to fully complete this project before our deadline of 12:00 PM on Friday, June 19, 2026.
8. During every step of implementing the new U.S. Congressional Districts, the DCEC will undertake multiple checks to ensure proper voter assignment and issuance of ballots. The DCEC had already formed a plan to ensure accurate voter assignments for the upcoming redistricting after the 2030 census. The DCEC has moved forward with implementing that plan in 2026.

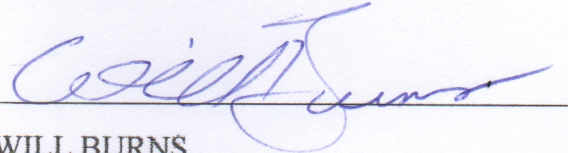






9. The DCEC will be able to send out military and overseas ballots in a timely manner. The redistricting project in Davidson County will be completed before the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) deadline of Monday, June 22, 2026.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in blue ink, appearing to read "Will Burns", is written over a horizontal line.

WILL BURNS

5-12-26

Date





