

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

TATI ABU KING and TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, *in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia*; ROSALYN R. DANCE, *in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia*; GEORGIA ALVIS-LONG, *in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia*; DONALD W. MERRICKS, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; MATTHEW WEINSTEIN, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; SUSAN BEALS, *in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia*; ERIC SPICER, *in his official capacity as the General Registrar of Fairfax County, Virginia*; and SANDY C. ELSWICK, *in her official capacity as the General Registrar of Smyth County, Virginia*,

Defendants.

Case No. 3:23-cv-00408 (JAG)

**DECLARATION OF BRITTANY BLUEITT AMADI IN SUPPORT OF  
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Brittany Blueitt Amadi, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Plaintiffs King and Johnson (“Plaintiffs”) in the above-captioned action. I am familiar with the facts set forth in this declaration. I am competent and willing to testify to the matters contained in this declaration.

2. I submit this declaration in support of Plaintiffs’ Motion for Summary Judgment.

3. Attached as Exhibit A is a true and correct copy of Defendants’ Second Supplemental Responses to Plaintiffs’ First Set of Interrogatories, served on July 1, 2025.

4. Attached as Exhibit B is a true and correct copy of the Declaration of Edward L. Ayers, attaching and attesting to the Expert Report of Edward L. Ayers.

5. Attached as Exhibit C is a true and correct copy of the Declaration of Carissa Byrne Hessick, attaching and attesting to the Expert Report of Carissa Byrne Hessick.

6. Attached as Exhibit D is a true and correct copy of the Deposition transcript of Edward L. Ayers, taken on July 8, 2025. This deposition transcript is near-final, pending review by Professor Ayers. In the event that any corrections are made to the transcript, counsel will file any errata with the Court.

7. Attached as Exhibit E is a true and correct copy of Defendants’ Responses to Plaintiffs’ Second Set of Requests for Admission, served on June 30, 2025.

8. Attached as Exhibit F is a true and correct copy of Docket 77-2, Declaration of Susan Beals, Commissioner of Elections.

9. Attached as Exhibit G is a true and correct copy of Defendant’s Responses and Objections to Plaintiffs’ First Set of Requests for Admission, served on February 26, 2025.

10. Attached as Exhibit H is a true and correct copy of Defendants' Supplemental Response to Plaintiffs' First Set of Interrogatories, served on June 10, 2025.

11. Attached as Exhibit I is a true and correct copy of excerpts of Plaintiff King's First Production of Documents, served on July 7, 2025, labeled KING-001 to KING-085. Exhibit I includes the following documents:

- a. KING-001 to KING-020 is a true and correct copy of The Sentencing Project's "Locked Out 2020: Estimates of People Denied Voting Rights Due to a Felony Conviction" report, which describes U.S. Census data related to voting eligible populations. KING-001 to KING-020 was downloaded from <https://www.sentencingproject.org/app/uploads/2022/08/Locked-Out-2020.pdf> on July 7, 2025.
- b. KING-021 to KING-045 is a true and correct copy of The Sentencing Project's "Locked Out 2022: Estimates of People Denied Voting Rights Due to a Felony Conviction" report, which describes U.S. Census data related to voting eligible populations. KING-021 to KING-045 was downloaded from <https://www.sentencingproject.org/reports/locked-out-2022-estimates-of-people-denied-voting-rights/> on July 7, 2025.
- c. KING-046 to KING-085 is a true and correct copy of The Sentencing Project's "Locked Out 2024: Four Million Denied Voting Rights Due to a Felony Conviction" report, which describes U.S. Census data related to voting eligible populations. KING-046 to JOHNSON-085 was downloaded from <https://www.sentencingproject.org/reports/locked-out-2024-four-million-denied-voting-rights-due-to-a-felony-conviction/> on July 7, 2025.

12. Attached as Exhibit J is a true and correct copy of excerpts from the Congressional Globe record of the 1870 Second Session of the Forty-First Congress, including the portions cited in the Expert Report of Edward L. Ayers.

13. Attached as Exhibit K is a true and correct copy of the Deposition Transcript of Carissa Byrne Hessick dated July 3, 2025. This deposition transcript is near-final, pending review by Professor Hessick. In the event that any corrections are made to the transcript, counsel will file any errata with the Court.

14. Attached as Exhibit L is a true and correct copy of relevant portions of Plaintiff King's First Production of Documents, labeled KING-000008. KING-000008 is a true and correct copy of Plaintiff Tati Abu King's grant of voting rights restoration notice letter, dated June 13, 2017.

15. Attached as Exhibit M is a true and correct copy of excerpts from the Congressional Globe record of the 1867 Second Session of the Thirty-Ninth Congress, including the portions cited in the Expert Report of Edward L. Ayers.

16. Attached as Exhibit N is a true and correct copy of excerpts from the Congressional Globe record of the 1868 Second Session of the Fortieth Congress, including the portions cited in the Expert Report of Edward L. Ayers.

17. Attached as Exhibit O is a true and accurate copy of excerpts from the Commission on Constitutional Revision, Constitution of Virginia at 106 (1968).

18. Attached as Exhibit P is a true and accurate copy of excerpts from the Report of the Proceedings and Debates of the Constitutional Convention, State of Virginia, Held in the City of Richmond June 12, 1901 to June 26, 1902, 1:20 (Hermitage Press, 1906).

I declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief.

Dated: July 18, 2025

/s/ Brittany Blueitt Amadi  
Brittany Blueitt Amadi (VSB No. 80078)  
Counsel for Plaintiff