

**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)

**THIRD DECLARATION OF BRITTANY BLUEITT AMADI  
IN SUPPORT OF PLAINTIFF'S REPLIES IN SUPPORT OF PLAINTIFFS' MOTIONS  
FOR CLASS CERTIFICATION AND 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 Tati Abu King and Toni Johnson 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' Reply in Support of Plaintiffs' Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Class Certification.

3. Attached as Exhibit AE is a true and correct copy of the e-mail thread between counsel for the parties, Nicholas Werle and John Ramer, dated January 27, 2025 through June 18, 2025.

4. Attached as Exhibit AF is a true and correct copy of excerpts of 4 William Blackstone, *Commentaries On The Laws Of England* (G.W. Childs 1868).

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

Dated: August 21, 2025

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