DECLARATION OF MARK BREWER

I, Mark Brewer, hereby declare:

1. Except as otherwise specifically indicated, I state all facts herein of my own first hand personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. I am the duly elected Chair of the Michigan Democratic Party ("MDP").

3. According to the MDP’s records, plaintiff Martha Hayes first joined MDP on November 16, 2007. I am aware of no involvement or participation by Martha Hayes in MDP’s activities or affairs prior to the filing of this lawsuit. According to our records, Martha Hayes did not participate in MDP’s 2004 Presidential caucus.

4. The following individuals have withdrawn their names from the January 15, 2008 Presidential Primary Democratic Party ballot in Michigan: Joe Biden, John Edwards, Barack Obama and Bill Richardson. The following candidates will appear on the January 15, 2008 Democratic
Party Presidential Primary ballot in Michigan: Hillary Clinton, Chris Dodd, Dennis Kucinich and Mike Gravel. Supporters of candidates who have withdrawn from the Presidential Primary have the option, and in some cases have been urged by the withdrawing candidates, to vote the “uncommitted” slot on the Primary ballot. Uncommitted delegates to the Democratic Party’s National Convention can vote at the Convention for any candidate they wish, including a candidate who does not appear on the Michigan Presidential Primary election ballot. In addition, the Primary ballot allows the voter to write in a candidate’s name. A sample January 15, 2008 Democratic Party Presidential Primary ballot is attached. (The candidate names are randomly rotated so all ballots are not identical.)

5. MDP has expended significant time, money and resources implementing its Delegate Selection Plan based on the January 15, 2008 Presidential Primary results. MDP will suffer a significant disruption if it is required to devise and implement an alternative delegate selection method. Devising, approving and implementing an alternative delegate selection method will subject MDP to substantial costs, in time, effort, money and resources. Conducting a state-wide Presidential preference caucus would require a significant amount of time and resources. MDP would not be able to arrange and conduct caucuses in lieu of its current Delegate Selection Plan by February 9, 2008, or even by the end of February, 2008.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 28, 2007.

MARK BREWER

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PARTISAN SECTION

PRESIDENTIAL

Democratic Party
Presidential Primary

PRESIDENT OF THE UNITED STATES
Vote for not more than 1

Hillary Clinton ☐

Chris Dodd ☐

Mike Gravel ☐

Dennis Kucinich ☐

Uncommitted ☐

(Write-In Space) ☐

Please note

Additional offices and proposals may appear on your ballot. Please contact your local clerk for more information.

Candidates may not appear on the official ballot you receive in the same order listed on this sample ballot.