

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BLACK VOTERS MATTER FUND, et al.,	}	
Plaintiffs,	}	
vs.	}	Civil Action No.: 20-cv-1489-AT
BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia, et al.,	}	
Defendants.	}	

DECLARATION OF SEAN J. YOUNG

I, Sean J. Young, make the following declaration under 28 U.S.C. § 1746.

1. I am the Legal Director of the ACLU of Georgia, where I have worked since 2017, and focus predominantly on voting rights. I was previously a Staff Attorney with the ACLU Voting Rights Project, in New York, from 2013 to 2017, where I focused exclusively on voting rights.

2. I obtained a Bachelor of Science (economics) and Bachelor of Arts (computer science) degree from Duke University in 2002, and a Juris Doctor from Yale Law School in 2006.

3. I have been admitted to the Georgia bar (Georgia Superior Courts and all other lower courts) (2017); the Georgia Court of Appeals (2017); and the Supreme Court of Georgia (2017). I was first admitted to the practice of law in the State of New York in 2007. I have been continuously engaged in the practice of law on a full-time basis since 2007.

4. I am admitted to the following federal courts: U.S. District Courts for the Middle District of Georgia (2017); Southern District of Georgia (2018); and Northern District of Georgia (2017); U.S. Courts of Appeals for the Eleventh Circuit (2017), and the United States Supreme Court (2014). In addition, I am admitted to the First (2016), Sixth (2014), and Seventh (2013) Circuits, as well as the Southern District of New York (2009); Eastern District of New York (2009); and Eastern District of Wisconsin (2013).

5. My work history is as follows: From 2006 to 2007, I was a litigation associate with Hughes, Hubbard & Reed LLP. From 2007 to 2009, I worked as the law clerk for the Honorable Laura Taylor Swain in the U.S. District Court for the Southern District of New York. From 2009 to 2012, I was a litigation associate with Skadden, Arps, Meagher & Flom LLP. For five months from February to July 2012, I worked as a volunteer attorney for the American Civil Liberties Union (“ACLU”). From August 2012 to 2013, I worked as a law clerk for the Honorable Ann Claire Williams in the U.S. Court of Appeals for the Seventh Circuit.

6. From 2013 to 2017, I was a staff attorney (then senior staff attorney) for the ACLU Voting Rights Project. At the ACLU, I litigated exclusively voting rights cases. My work includes being lead counsel and arguing in the second and third appeals before the Seventh Circuit in a challenge to Wisconsin's voter ID law. The second appeal was successful and resulted in *Frank v. Walker*, 819 F.3d 384 (7th Cir. 2016), which established for the first time that voters with difficulty obtaining ID may be exempt from a voter ID law notwithstanding the state's compelling interest in preventing voter fraud; *see also* 835 F.3d 649 (7th Cir. 2016) (en banc) (reaffirming this principle).

7. I was also lead counsel in *Ohio NAACP v. Husted*, 768 F.3d 524 (6th Cir. 2014) (holding that Ohio's early voting cutbacks violated Section 2 of the Voting Rights Act and the Fourteenth Amendment), *vacated on other grounds*, setting forth a two-part Section 2 vote denial test later adopted by the Fourth Circuit in *League of Women Voters of N.C. v. N.C.*, 769 F.3d 224, 240 (4th Cir. 2014) (citing *Husted*, striking down early voting cutbacks among other restrictions), and *Veasey v. Abbott*, 830 F.3d 216, 244 (5th Cir. 2016) (en banc) (citing *League of Women Voters of N.C.* and *Husted*, striking down Texas's voter ID law).

8. In addition, on behalf of the Campaign Legal Center, the ACLU, and other organizations, I was a lead drafter of the first half of an amicus brief

submitted to the U.S. Supreme Court in *Ariz. State Legislature v. Ariz. Indep. Redistricting Comm'n*, 135 S. Ct. 2652 (2015). On behalf of the ACLU and ACLU of Texas, I was the lead drafter of a U.S. Supreme Court amicus brief in *Evenwel v. Abbott*, 136 S. Ct. 1120 (2016). I was also the lead drafter of a portion of an opposition to certiorari brief submitted to the U.S. Supreme Court, in *Husted v. A. Phillip Randolph Institute*, 138 S. Ct. 1833 (2018).

7. From 2017 to the present, I have been the legal director of the ACLU of Georgia, where I have predominantly focused on voting rights. I was lead counsel in the following Georgia voting rights cases: *ACLU of Georgia v. Fulton County Board of Registration & Elections*, 2017CV292939 (Fulton Cnty. Super. Ct.) (mandamus action blocking illegal polling place closures due to failure to comply with notice laws); *Hopkins v. Kemp*, 2017CV293325 (Fulton Cnty. Super. Ct.) (prevented illegal removal of up to 160,000 voters from active voter rolls); *Palacios v. Kemp*, 2018CV305433 (Fulton Cnty. Super. Ct.) (case on behalf of newly-naturalized U.S. citizen barred from seeking state office), which included a request for leave to appeal filed with the Georgia Supreme Court; *Georgia Muslim Voter Project v. Kemp*, 918 F.3d 1262 (11th Cir. 2019) (denying stay of preliminary injunction enjoining operation of unconstitutional signature-match law by requiring Secretary to issue guidance to counties). I was local counsel and co-counsel in *Georgia Shift v. Gwinnett Cnty*, 19-cv-1135 (N.D.Ga.) (lawsuit against

four metro counties for failure to run proper election), and I am co-counsel in *Whitest v. Crisp Cnty. Bd. of Educ.*, 17-cv-109 (M.D.Ga.) (challenging board of education redistricting plan as violation of Voting Rights Act); *Wright v. Sumter Cnty. Bd. of Educ.*, 14-cv-42 (M.D.Ga.) (same).

8. In addition, during my time with the ACLU of Georgia, I was lead counsel in three First Amendment lawsuits. *See Rubin v. Young*, 2019 WL 1418289, No. 1:19-cv-1158-SCJ (N.D. Ga. Mar. 14, 2019) (temporary restraining order, later converted into final judgment, prohibiting the Capitol Police from banning profanity in the State Capitol Building); *Rasman v. Stancil*, 1:18-cv-1321-WSD (N.D. Ga. Mar. 29, 2018) (temporary restraining order prohibiting the Capitol Police from banning hand-held signs in the State Capitol Building); *Solomon v. City of Savannah* (S.D. Ga. 2018) (challenging Savannah's ban on signs during parade featuring the Vice President; Savannah lifted ban as soon as lawsuit was filed). I am lead counsel in a Fourth Amendment lawsuit challenging police practices concerning drivers arrested for being allegedly under the influence of marijuana. *Ebner v. Cobb County*, 17-cv-3722 (N.D. Ga.).

8. In 2019, I was awarded Attorney of the Year by the Daily Report and received the Best LGBTQ+ Lawyers Under 40 Award – Class of 2019 by the National LGBT Bar Association & Foundation.

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

Executed on May 26, 2020, at Atlanta, Georgia.

/s/ Sean J. Young

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