

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

BLACK VOTERS MATTER FUND, et  
al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State of  
Georgia, et al.,

Defendants.

Civil Action No.: 20-cv-1489-AT

**DECLARATION OF SOPHIA LIN LAKIN**

I, Sophia Lin Lakin, make the following declaration under 28 U.S.C. § 1746.

1. I am, and have been since February 2020, the deputy director of the Voting Rights Project of the national office of the American Civil Liberties Union Foundation (ACLU). From 2015 until I became the deputy director, I was a staff attorney with the Voting Rights Project. I practice exclusively in the area of voting rights.

2. The American Civil Liberties Union (“ACLU”) is a nationwide, nonprofit, nonpartisan organization with over 1,600,000 members dedicated to defending the principles embodied in the Constitution and our nation’s civil rights

laws. The ACLU Foundation is a national nonprofit organization under section 501(c)(3) of the Internal Revenue Code and educates the public about civil liberties and employs lawyers who provide legal representation free of charge in cases involving civil liberties. The ACLU Voting Rights Project was established in 1965 – the same year that the historic Voting Rights Act (VRA) was enacted – and has litigated more than 300 cases since that time, including numerous voting rights cases in the U.S. Supreme Court, including: *Department of Commerce v. State of New York*, 139 S. Ct. 2551 (2019); *Ohio A Philip Randolph Institute v. Husted*, 138 S. Ct. 1833 (2018); *Shelby County v. Holder*, 570 U.S. 529 (2013); *Arizona v. Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1 (2013); *Nw. Austin Mun. Util. Dist. No. One v. Holder*, 557 U.S. 193 (2009); *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181 (2008); and *Abrams v. Johnson*, 521 U.S. 74 (1997).

3. I obtained a Bachelors of Arts degree (Political Science) and a Masters of Science degree (Management Science and Engineering) and from Stanford University in 2004, and a Juris Doctor from Stanford Law School in 2012.

4. I was admitted to the practice of law in the State of New York in 2013. I have been continuously engaged in the practice of law on a full-time basis since 2013. I am admitted to the following federal courts: Eastern District of Wisconsin (2015), Fourth Circuit (2016), Fifth Circuit (2017), Sixth Circuit

(2017), Seventh Circuit (2018), Eighth Circuit (2016), Tenth Circuit (2016), Eleventh Circuit (2017), and the United States Supreme Court (2017).

5. My work history is as follows: From 2012 to 2013, I worked as a law clerk for the Honorable Carol Bagley Amon of the U.S. District Court for the Eastern District of New York. From 2014-2015, I worked as a law clerk for the Honorable Raymond J. Lohier, Jr., of the U.S. Court of Appeals for the Second Circuit.

6. From February 2015 to February 2020, I was first a Legal Fellow and subsequently a Staff Attorney in the ACLU's Voting Rights Project. In this capacity, I litigated numerous voting rights cases across the country, including: *League of Women Voters of Tennessee v. Hargett*, 400 F. Supp. 3d 706 (M.D. Tenn. 2019) (lead counsel in case successfully obtaining preliminary injunction in case challenging Tennessee law imposing strict requirements and criminal and civil penalties for noncompliance on community-based organizations that conduct voter registration drives); *Common Cause v. Lawson*, 937 F.3d 944 (7th Cir. 2019) (case challenging unlawful voter roll purge program in Indiana); *Ohio A Philip Randolph Institute v. Husted*, 138 S. Ct. 1833 (2018); *Fish v. Schwab*, 957 F.3d 1105 (10th Cir. 2020) (successfully challenging citizenship documentation requirements for voter registration in Kansas); *North Carolina State Conference of NAACP v. McCrory*, 831 F.3d 204 (4th Cir. 2016) (successfully challenging, *inter*

*alia*, voter ID requirement, cutbacks to early voting and the elimination of same-day registration in North Carolina); *Frank v. Walker*, 768 F.3d 744 (7th Cir. 2014) (challenging Wisconsin's voter ID law).

7. From February 2020 to present, I have been the Deputy Director of the ACLU's Voting Rights Project. In this capacity, I supervise and directly participate in the ACLU's docket of voting rights litigation throughout the country, including: *Mo. NAACP v. Missouri*, No. SC98536 (Mo. Supreme Ct.) (lead counsel in case challenging state's absentee ballot restrictions during COVID-19 pandemic); *League of Women Voters of Va. v. Va. State Bd. of Elections*, No. 6:20-CV-00024, 2020 WL 1158249 (W.D. Va. May 5, 2020) (case challenging Virginia's witness requirement for absentee ballots during COVID-19 pandemic); *Thomas v. Andino*, No. 3:20-cv-01552, 2020 WL 2306615 (D.S.C. May 8, 2020) (case challenging South Carolina's absentee ballot restrictions and witness requirement during COVID-19).

8. I have conducting voting rights trainings and continuing legal education courses for numerous audiences and bar associations, including the National Asian Pacific American Bar Association, National Association for the Advancement of Colored People, South Asian Bar Association of North American, and the Kansas City Metropolitan Bar Association. I have also spoken on voting

rights issues at various law schools, including Stanford Law School, Yale Law School, Harvard Law School, Columbia Law School, and New York Law School.

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

Executed on May 31, 2020, at New York City, New York.

**/s/ Sophia Lin Lakin**

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