

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

BARBARA H. LEE, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:15-CV-357

**DECLARATION OF AMANDA CALLAIS IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO MOTION TO EXCLUDE
EXPERT TESTIMONY OF LORRAINE MINNITE**

I, Amanda R. Callais, am associated with the law firm of Perkins Coie LLP and counsel of record for the Plaintiffs in this matter. I hereby submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony of Lorraine Minnite:

1. Attached as Exhibit A is a true and correct excerpt of the rough transcript of Dr. Lorraine Minnite's trial testimony in the matter *N.C. State Conference of the NAACP v. North Carolina* (15-658, M.D.N.C.). The transcript is dated January 27, 2016.

2. Attached as Exhibit B is a true and correct copy of the expert report that Dr. Lorraine Minnite submitted in this matter, dated December 14, 2015.

3. Attached as Exhibit C is a true and correct copy of Dr. Lorraine Minnite's Reply to Defendants' Rebuttal Expert Reports submitted in this matter and dated January 15, 2016.

4. Attached as Exhibit D is a true and correct copy of an excerpt to the transcript of the 30(b)(6) deposition of Defendant the Virginia Department of Elections taken in this matter and on February 3, 2016.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge and belief.

DATED: February 5, 2016
Washington, D.C.



Amanda R. Callais