## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC., et al.,

Plaintiffs,

v.

Civil Action No. 17 Civ. 05427 (ALC)

DONALD J. TRUMP, et al.,

Defendants.

## DECLARATION OF NATASHA C. MERLE IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

- I, NATASHA C. MERLE, pursuant to the provisions of 28 U.S.C. § 1746, declare, under penalty of perjury, as follows:
- 1. I am an attorney with the NAACP Legal Defense & Educational Fund, Inc. representing Plaintiffs in this matter.
- 2. Attached to this Declaration please find true and correct copies of the following documents:
  - Ex. A Document Index, originally filed in *Lawyers' Committee for Civil Rights*Under Law v. Presidential Advisory Commission on Election Integrity, 17cv-1354 (CKK) (D.D.C. Sept. 29, 2017), ECF No. 33-3
  - Ex. B Complaint, Dunlap v. Presidential Advisory Commission on Election

    Integrity, 17-cv-02361 (CKK) (D.D.C. Nov. 9. 2017), ECF No. 1
  - Ex. C Declaration of Dr. Joan Duvall Flynn, President, NAACP of Pennsylvania, dated December 8, 2017

Ex. D Statement of Secretary Kris W. Kobach, Vice Chair, Presidential Advisory

Commission on Election Integrity, PACEI meeting (July 19, 2017)

I DECLARE under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of December 2017.

\_/s/ Natasha C. Merle\_

Natasha C. Merle Bar No. NM3056 NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC. 40 Rector St., 5th Floor

New York, NY 10006 Tel.: (212) 965-2200 Fax.: (212) 226-7592 nmerle@naacpldf.org