

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

ROBERT FOSTER; KATIE LIGON; KIRBY
CARTER; JOHN T. WILLIAMS,

Plaintiffs,

vs.

THE STATE OF MISSISSIPPI; THE STATE
BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, in his official capacities as
Governor of the State of Mississippi and a
Member of the State Board of Election
Commissioners; LYNN FITCH, in her official
capacities as the Mississippi Attorney General
and a Member of the State Board of Election
Commissioners; and MICHAEL WATSON, in
his official capacities as the Mississippi Secretary
of State and a Member of the State Board of
Election Commissioners,

Defendants.

**CIVIL ACTION NO.
3:26-CV-00181-MPM-JMV**

**DECLARATION OF DORCAS E. WASHINGTON ON BEHALF OF DELTA
SIGMA THETA SORORITY, INC.**

I, Dorcas E. Washington., declare as follows:

1. I am a U.S. citizen, over the age of 18, and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I currently serve as the Executive Director of Delta Sigma Theta Sorority, Inc.
3. Through this role, I am familiar with, and receive updates about, Delta Sigma Theta's voting-related activities and efforts through our national, regional, and local programs and initiatives that focus on many different issues, including nonpartisan civic engagement, election education, and advocacy.

4. Delta Sigma Theta is a national, nonpartisan, not-for-profit membership service organization, comprised predominantly of Black women that was founded in 1913 on the campus of Howard University and incorporated under the laws of Washington, D.C.

5. Civic engagement has remained a core tenet of Delta Sigma Theta's mission since the Sorority was founded, as democracy and justice can only be achieved through voting.

6. The DeSoto County chapter of Delta Sigma Theta coordinates with other civic-minded organizations in DeSoto County to provide voter education and information, and to encourage voter registration and turnout in elections.

7. In Mississippi, Delta Sigma Theta has 75 alumnae and college chapters and over 1,000 members, including 234 members in DeSoto County. Delta Sigma Theta has several members who are Black registered voters of DeSoto County who live and vote in Horn Lake and Southaven.

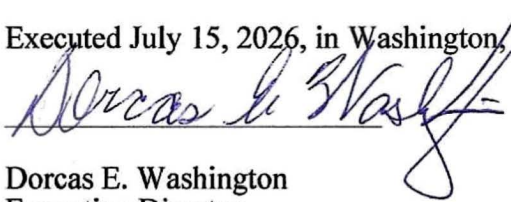
8. I have reviewed a map of the subdistrict in DeSoto County that was created by the Mississippi Legislature to elect a circuit court judge and a chancery court judge. I understand that subdistrict includes several precincts in the Horn Lake and Southaven area in DeSoto County.

9. Currently, at least 92 members of the DeSoto County chapter reside in the subdistrict.

10. I understand that Plaintiffs seek to prevent the subdistrict from being used to elect judges to the circuit and chancery court in DeSoto County. I am concerned that doing so will deny the residents of the subdistrict, including members of the DeSoto County chapter, a fair opportunity to elect candidates of their choice.

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

Executed July 15, 2026, in Washington, DC.

A handwritten signature in blue ink, appearing to read "Dorcas E. Washington", written over a horizontal line.

Dorcas E. Washington
Executive Director
On behalf of Delta Sigma Theta Sorority, Inc.