

**IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

TELISE TURNER, GARY WYGANT, and
FRANCIE HUNT,

Plaintiffs,

v.

CASE NO. 22-0287-IV

WILLIAM LEE, as Governor of Tennessee, in his
official capacity; TRE HARGETT, as Tennessee
Secretary of State, in his official capacity; and
MARK GOINS, as Tennessee Coordinator of
Elections, in his official capacity,

Chancellor Perkins
Chancellor Maroney
Judge Sharp

Defendants.

AFFIDAVIT OF DAVID G. BRADLEE

State of Tennessee)
County of Shelby)

I, David G. Bradlee, being duly sworn, depose and say:

1. I am over 18 years of age, a resident of the State of Washington, legally competent to give this affidavit and have personal knowledge of the facts set forth in this affidavit.
2. I have a B.S. in mathematics and computer science from Union College (NY) and a Ph.D. in computer science from the University of Washington.
3. I have over forty (40) years of software engineering experience at Data General, Microsoft and LabKey Software. I helped build computers for Fortran, Pascal, C and Visual Basic, worked on Microsoft Visio, was development manager for Microsoft's Natural Language Group, and developed software for medical researchers.
4. I created the original Dave's Redistricting App in 2009.

5. I am co-author of Dave's Redistricting App 2020 ("DRA 2020"), a free web app to create, view, analyze and share redistricting maps for all fifty (50) states, the District of Columbia and Puerto Rico.

6. In DRA 2020, a Share URL is unique to the particular map.

7. A unique Share URL cannot be rerouted to a different map.

8. Whoever owns a shared map can change it after sharing the link (URL), so when a map is viewed at a later date it may appear different to someone who had received the shared link.

FURTHER AFFIANT SAITH NOT.

David G Bradlee

DAVID G. BRADLEE

Sworn to and subscribed before me an online notary republic in the state of Tennessee by audio and video means this 28th day of February, 2023.



Remotely Notarized with audio/video via
Simplifile

Kelly A. Prevorsek

NOTARY PUBLIC

My Commission Expires: _____