

**IN THE CHANCERY COURT OF TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT**

TELISE TURNER, GARY WYGANT, and FRANCIE
HUNT,

Plaintiffs,

v.

CASE NO. 22-0287-IV

Chancellor Perkins

Chancellor Maroney

Judge Sharp

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,

Defendants.

EXHIBIT SIX

AFFIDAVIT OF DOUG HIMES

**IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE**

**TELISE TURNER, GARY WYGANT,)
and FRANCIE HUNT,)**

Plaintiffs,)

v.)

No. 22-0287-IV

**BILL LEE, Governor,)
TRE HARGETT, Secretary of State,)
and MARK GOINS, Tennessee)
Coordinator of Elections, all in their)
official capacity only,)**

Defendants.)

AFFIDAVIT OF DOUG HIMES

State of Tennessee)
County of Davidson)

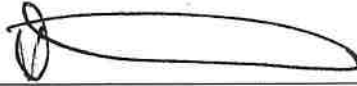
I, Doug Himes, being first duly sworn, depose and say:

1. I am over 18 years of age, legally competent to give this affidavit and have personal knowledge of the facts set forth in this affidavit.

2. I was provided copies of Dr. Jonathan Cervas' reports dated December 2, 2022, *Rebuttal Report of Plaintiff's Expert Regarding Tennessee State House Reapportionment* and January 9, 2022 *Response to Defendants' Expert Depositions Regarding Tennessee State House Reapportionment*.

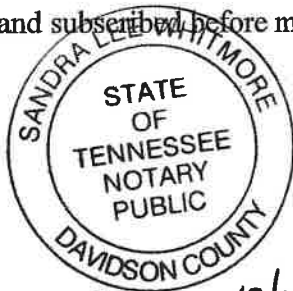
3. Attached hereto as Exhibit A are true and correct copies of my evaluations of Dr. Cervas' maps 13c, 13d, and 13d_e contained in the two reports mentioned above.

FURTHER AFFIANT SAITH NOT.



DOUG HIMES

Sworn to and subscribed before me this 20th day of January, 2023.




NOTARY PUBLIC

My Commission Expires: 10/2/2023

Jonathan Cervas House Concept – 13c

Statewide plan; 99 districts; 13 majority-minority districts

Overall Range = 9.96%

High = +5.09% (+3,552)

Low = -4.87% (-3,398)

County Splits: 24

Contiguity: Yes

Unassigned Areas: No

Jonathan Cervas House Concept – 13d

Statewide plan; 99 districts; 13 majority-minority districts

Overall Range = 9.89%

High = +5.09% (+3,552)

Low = -4.80% (-3,350)

County Splits: 24¹

Contiguity: No²

Unassigned Areas: No

¹ The double split of Sullivan County appears to violate Article II, Section 5 of the Constitution of Tennessee.

² One populated census block assigned to District 78 within District 69; one populated census block assigned to District 78 between Districts 68 and 69.

Jonathan Cervas House Concept – 13d e

Statewide plan; 99 districts; 13 majority-minority districts

Overall Range = 9.89%

High = +5.09% (+3,552)

Low = -4.80% (-3,350)

County Splits: 24

Contiguity: No³

Unassigned Areas: No

³ One populated census block assigned to District 78 between Districts 68 and 69; one unpopulated census block assigned to District 1 within District 3; one unpopulated census block assigned to District 1 between Districts 3 and