Declaration of Theodore M. Shaw

Pursuant to 28 U.S.C. Section 1746 I hereby declare the following:

1. I am Theodore M. Shaw. I live at 127 Graylyn Drive, Chapel Hill, North Carolina 27516. I am the Julius L. Chambers Distinguished Professor of Law and the Director of the Center for Civil Rights at the University of North Carolina Law School at Chapel Hill.

2. From September of 1979 until March of 1982 I worked as a Trial Attorney in the Civil Rights Division of the U.S. Department of Justice in Washington D.C.

3. During that time the usual practice in civil rights cases in which the Justice Department was involved was that Civil Rights Division attorneys, based in Washington, D.C., were the lead litigators for the United States. The name of the local U.S. attorney for the district in which the case was brought appeared on the government’s briefs and pleadings as a matter of course, but generally the U.S. attorneys were not intimately involved, if at all.

4. From March of 1982 until April of 2008, except for a period of time between 1990 through 1993 during which I taught at the University of Michigan Law School, I worked in various capacities for the NAACP Legal Defense Fund, Inc. Beginning in 1982 I directed the Legal Defense Fund’s education docket, which primarily consisted of school desegregation cases in the South.

5. During that time I worked with local Mobile cooperating attorneys on Birdie Mae Davis v. Board of School Commissioners of Mobile, Alabama. On information and belief, during some of that time Jeffrey Sessions was the U.S. Attorney for the Southern District of Alabama.

6. I have no recollection, knowledge, information and belief of Mr. Sessions working directly on the Davis case or working directly with me or any other LDF attorney while I was involved with the Davis case.

Executed on this 26th day of January, 2017

Theodore M. Shaw

Sworn to before me this 9th day of January, 2017

Notary Public

MONICA H. HILL
Notary Public
Orange Co., North Carolina
My Commission Expires Aug. 17, 2020