UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE,

4805 Mount Hope Drive Baltimore, MD 21215,

Plaintiff,

v.

UNITED STATES POSTAL SERVICE, 475 L'Enfant Plaza SW Room 4012 Washington, DC 20260-2200,

and

LOUIS DEJOY, in his official capacity as Postmaster General of the United States Postal Service,

U.S. Postal Service Office 475 L'Enfant Plaza SW Room 4012 Washington, DC 20260-2200,

Defendants.

Case No. 1:20-cv-02295-TSC

DECLARATION OF EARL GRAHAM

My name is Earl Graham and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

- 1. I am a 62-year-old African American man and father.
- 2. I was born in Newark, New Jersey and live in Blythewood, South Carolina.
- 3. I am disabled veteran.
- 4. I am a member of the NAACP.

- 5. I rely on the USPS for important mail, including for mail-order medications to treat backpain, headaches, arthritis, sciatica, and cholesterol.
- 6. Before this summer, my mail-order medications would arrive generally a few days after my doctor approved any prescription. Since mid-July, however, my medications have taken much longer to arrive, including sometimes arriving one week or longer after my doctor has approved prescriptions. Two weeks ago I reached out to the U.S. Department of Veterans Affairs ("VA") to inquiry about these delays. After a VA representative spoke with my prescription provider, the representative informed me that the delays were due to mail service delays.
- 7. For more than three decades, I have always voted in person for federal and state elections. But for the upcoming 2020 November general election, I will vote by mail for the first time because I am concerned about social distancing at polling locations and exposure to the virus, especially as someone at higher risk for severe illness. I am also concerned my ballot will not arrive in time to be counted because of the recent mail delays and reliability of mail services.

I, Earl Graham, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: August 22 2020 South Carolina

Earl Graham