

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

TENNESSEE DEMOCRATIC PARTY and)
MARQUITA BRADSHAW FOR SENATE,))
)
Plaintiffs,)
)
v.) No.)
)
MARK GOINS, Coordinator of Elections)
and TRE HARGETT, Secretary of State for)
the State of Tennessee, each in their official)
capacity for the State of Tennessee,)
)
Defendants.)

DECLARATION OF MARY BETH THOMAS

1. My name is Mary Beth Thomas. I am over the age of eighteen and I make this declaration, under penalty of perjury, from my personal knowledge and for use in the above styled case.

2. I serve as the General Counsel for the Department of State. I also serve as the Public Records Request Coordinator for the Department of State.

3. The Department of State has a Public Records Policy that is published on its website at www.sos.tn.gov and is attached hereto as Exhibit A.

4. Pursuant to the Public Records Policy, requests for copies of records of the Department of State must be made to the Public Records Request Coordinator via mail or email at SOS.PRRC@tn.gov. See Public Records Policy, p. 2.

5. As of Sunday, November 1, 2020, I have not received a request to the Department of State from the Tennessee Democratic Party or from Marquita Bradshaw for U.S. Senate for records or information relating to absentee voters who have requested but not yet returned a ballot.

6. I have spoken with my office's Executive Assistant, Julie Jones, who receives all mail on my behalf, and she also confirmed on November 1, 2020 that I have not received any public record requests via mail from the Tennessee Democratic Party or from Marquita Bradshaw for U.S. Senate.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed by me this 1st day of November 2020 at Nashville, Tennessee.

A handwritten signature in black ink, reading "Mary Beth Thomas", written over a horizontal line.

Mary Beth Thomas