

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

AMBER SHERMAN, RACHAEL SPRIGGS,
KERMIT MOORE, BLACK CLERGY
COLLABORATIVE OF MEMPHIS, MEMPHIS
A. PHILIP RANDOLPH INSTITUTE, THE
EQUITY ALLIANCE,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of Tennessee, MARK GOINS,
in his official capacity as Coordinator of Elections
for Tennessee, STATE ELECTION
COMMISSION, and DONNA BARRETT, JUDY
BLACKBURN, JIMMY ELDRIDGE, MIKE
MCDONALD, SECONDR MEADOWS,
VANECIA BELSER KIMBROW, and KENT
YOUNCE, in their official capacities as members
of the State Election Commission,

Defendants.

**THREE-JUDGE PANEL
REQUESTED**

Civil Action No 26 Civ. 616

Judge Campbell

NOTICE OF ADDENDUM AND CORRECTION

Plaintiffs submit this Notice to supply the Court with the Addendum and Correction to the expert report of Dr. Jonathan Cervas, which was included in the package of materials submitted in support of Plaintiffs' pending motion for a temporary restraining order and/or preliminary injunction, Pl.'s TRO & PI Mot., ECF No. 20. See Pl.'s TRO and PI Mot. Ex. 4, Report of Dr. Jonathan Cervas, ECF No. 20-4. As set forth in the Addendum and Correction, which is appended to this Notice, Dr. Cervas discovered an error in his original analysis and offers a corrected analysis correcting the error and confirming that the substance of Dr. Cervas's conclusions in his original report are not affected: It is virtually impossible to draw a Tennessee congressional map using

traditional districting principles that does not include a Black opportunity district in Memphis-Shelby County unless race is taken into account.

Dated this 18th day of May, 2026

Respectfully submitted,

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*motion for admission *pro hac vice* pending

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