

EXHIBIT 18

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VOTE FORWARD,
611 Pennsylvania Ave. SE #192
Washington, DC 20003;

AARON CARREL,
2 N Roby Rd.
Madison, WI 53726;

VOCES UNIDAS DE LAS MONTAÑAS,
1001 Grand Ave., Suite 107
Glenwood Springs, CO 81601;

COLORADO ORGANIZATION FOR
LATINA OPPORTUNITY AND
REPRODUCTIVE RIGHTS,
P.O. Box 40991
Denver, CO 80204;

and

PADRES & JÓVENES UNIDOS,
4130 Tejon St., Suite C
Denver, CO 80211,

Plaintiffs,

v.

LOUIS DEJOY, in his official
capacity as the Postmaster General,
475 L'Enfant Plaza SW,
Washington, D.C. 20260-0546;

and

UNITED STATES POSTAL SERVICE,
475 L'Enfant Plaza SW
Washington, DC 20260-0546,

Defendants.

Civil Case No. 1:20-cv-02405-EGS

DECLARATION OF KATHRYN MONTGOMERY

I, Kathryn Montgomery, declare as follows:

1. The matters set forth herein are true and correct of my own personal knowledge. If called as a witness, I could and would testify competently thereto.
2. I am 81 years of age and a resident of New Orleans, Louisiana. I am a registered voter in Louisiana, and have been for approximately 7 years. Normally, I prefer to vote in person because I love to see the election process unfold as well as talk and mingle with my friends and neighbors. Because of the ongoing COVID-19 pandemic and the need to minimize my risk of exposure to the virus, I decided to vote by mail in the primaries held in July and the subsequent runoffs.
3. I have not yet received my absentee ballot for the November election. Based on when I received my absentee ballot for the July primaries, I would expect to receive my November absentee ballot four to six weeks before the election, but I cannot be positive of that timing.
4. I intend to vote by mail in the November 2020 general election because of my concerns of exposure to and potential contraction of COVID-19. I know that as a woman of 81 years-of-age, I am at higher risk of developing severe complications should I contract COVID-19.
5. I want to submit my absentee ballot as early as possible in order to avoid any potential issues with my ballot being received on time. However, there is an extremely important race for District Attorney in my Parish. There are currently four candidates of which I am aware who are running for District Attorney. Right now, I only feel properly informed about one of the candidates, as there is insufficient information available for all four candidates. It is my understanding that in the coming weeks, each of the candidates' positions, stances, goals, and other information will be revealed in greater detail as the race progresses. Given the broad array

of candidates, their potential stances, and the importance of this race, I wish to wait until I can properly understand each candidate before I vote.

6. In Louisiana, a completed ballot must be received by November 2, the day before Election Day, in order to be counted. Because I intend to mail my ballot close to election day, I fear that the delays caused by the United States Postal Service will cause my ballot to not arrive on time and therefore not be counted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 3, 2020, in New Orleans, Louisiana.

/s/ Kathryn Montgomery

Kathryn Montgomery