

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF TAYLOR BATES

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I, Taylor Bates, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Caucasian male from Nashville, Tennessee.
2. I just completed my senior year at The University of North Carolina at Chapel Hill ("UNC-CH"). I majored in Economics and Public Policy, and received a minor in Education.
3. I served for three years as President of the UNC-CH Residence Hall Association ("RHA") and am a member of the National Residence Hall Honorary. I first became involved with the RHA as a first-year, out-of-state student looking for a way to build a community on campus. Later, I decided to run for RHA President because I wanted to help students from different places and backgrounds feel at home. The other RHA officers and I strive to accomplish that goal by providing fun programs and educational initiatives for students. Bates Declaration Exhibit 1 is a photograph of myself (far right) with other members of the 2016-17 RHA executive board. Bates Declaration Exhibit 2 is a photograph of myself (far right) with other members of the 2015-16 RHA executive board.
4. I also am a member of the Carolina Union Board of Directors. The Union is a visible, central meeting place for students and the place where student organizations reside. In short, it is a hub for student life. I enjoy talking with faculty and other leaders about how to make the Union feel more like home to more students.

5. In addition to my activities on campus, I am an intern with the International Lactation Consultant program. In that role, I am helping to write a policy manual with the ultimate goal of sharing knowledge about childhood nutrition.

Diversity at UNC-CH

6. Interacting with students who are different from me has greatly impacted my educational experience. For example, I took a class on justice and public policy taught by Dr. Benjamin Meier. The class was based on classroom discussions of complex topics, many of which were related to public health policy. Hearing others speak from different life experiences often prompted me to think about issues differently. It also helped me understand that weighing the merits of public health policy requires consideration of issues like economics and access to health care. Public health is an issue that goes beyond what we can read in a textbook. As a public policy major, understanding the impact of public health policy from different perspectives is important.

7. UNC-CH actively fosters understanding of diverse points of view outside the classroom as well. One example is the Tunnels of Oppression Program put on by RHA and several other student organizations, which helps students explore different identities and understand different perspectives.

8. Other programs that promote understanding of diversity include the Carolina Conversations held at the Union; the social justice and diversity forums at the Campus Y; the educational components of the Spring into Service event; International Fest; and the RHA Social Justice Advocate Program, through which student advocates learn about topics like privilege and help incorporate those lessons into engaging and fun programs for students who live in UNC-CH residence halls.

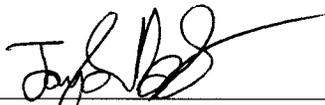
9. Extracurricular programs like the ones described above have greatly impacted my experience at UNC-CH in a positive way. I have friends of many different backgrounds. I also have much broader knowledge of history and diverse cultures, which I can connect with discussions in a variety of settings. I am better able to interact with different people and experiences. For example, when I see concerns about police brutality in the media, I am able to keep in mind what it means to people on a personal level. I haven't experienced police brutality myself, but when engaging in discussion, I can understand that it is an emotional and personal issue.

Conclusion

10. Diversity at UNC-CH has provided a big educational benefit to me both inside and outside of the classroom.

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

Executed on 5/12/17.



Taylor Bates

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DECLARATION OF REGAN BUCHANAN

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I, Regan Buchanan, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I recently graduated from The University of North Carolina at Chapel Hill (“UNC-CH” or the “University”) with a degree in Global Studies and Geography and a minor in Spanish.

2. I am a White female. I grew up in Raleigh, North Carolina, but my family is originally from Kentucky. I have lived in the Triangle area of North Carolina since I was two years old.

3. I went to Wakefield High School in North Raleigh. Wakefield is a public school that is mostly made up of students from White, upper middle class families.

4. At UNC-CH, I was the co-president of Campus Y, an organization that engages students, the UNC campus, and communities in the pursuit of social justice. I was elected to this position and oversaw a \$250,000 student operating budget. I led biweekly meetings of over 70 student organization leaders and managed a 13 person executive board.

5. Prior to that position, I worked with Students United for Immigrant Equality (“SUIE”), an organization operating within Campus Y that advocates for immigrant issues.

6. I also worked for Breakthrough San Francisco to help provide children with academic support and as an Agricultural Safety and Health Intern for the North Carolina Department of Labor.

My Experience at UNC-CH

7. I applied to a lot of public schools, both in and outside of North Carolina. I chose UNC-CH because it was the best school in the region.

8. At UNC-CH, I joined SUIE my first year. Working at SUIE was the first time I met undocumented students. I knew there were issues and challenges with undocumented students, but I never appreciated how serious those were until I actually met them. Now, one of my passions is to make sure education and opportunities are available to everyone regardless of their documentation status. I would never have had this experience without the opportunity to meet fellow students who are undocumented.

9. I found my residence halls and classes to be diverse, but my most meaningful exposure to diversity was through Campus Y because it has the Center for Social Justice. Although it is important to be in classes with students from different backgrounds, that does not always provide an opportunity to sit down and talk about race. Under-represented minority students are not responsible for educating students about race. At Campus Y, however, we have conversations about social justice all of the time and people from different backgrounds bring their perspectives. For instance, we organized an event for students of all backgrounds to come together to discuss and address the U.S. Presidential election. Students from many different backgrounds spoke at the event.

10. My classroom experience was greatly enhanced because of diversity. In my Latin American Politics class we talked about certain social conditions in Mexico, including about how the State and drug gangs are working together to extort civilians. A student from Mexico raised his hand and offered his personal experience. He led a conversation about what it was like to be a civilian in Mexico while all of this was going on. It is one thing to talk about systems of oppression and theories for why it is happening from what is written in a text book, but it is another thing entirely to talk about the systems as they pertain to individual experiences. I learned a great deal from my fellow students.

11. I went to high school with people who looked just like me and had the same experiences I had. I knew racism existed, but I never knew the extent to which racism impacts people's day to day lives currently. Being around people who did not look like me at UNC-CH and hearing their experiences about racism, I learned that it is not just about extreme racism--people burning crosses, for example -- but that racism is present in systems and institutions. This opened my eyes to the way the world works and has dramatically changed the way I think about the world.

Conclusion

12. Diversity benefits everyone. It makes UNC-CH a better place by promoting exposure to difference and expanding students' experiences and world views. Diversity makes UNC-CH accountable to the state. UNC-CH is a public school funded by tax dollars and is responsible to improve the lives of all North Carolinians. Not everyone from North Carolina is White. We need faculty and students to push the

University to serve everyone in the State. UNC-CH has better diversity than many institutions, but we need to do even more.

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

Executed on: 6/21/17

Regan D. Buchanan
Regan Buchanan

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DECLARATION OF LAUREN EAVES

DECLARATION OF LAUREN EAVES

I, Lauren Eaves, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a rising senior at The University of North Carolina at Chapel Hill (“UNC” or “Carolina”).
2. I am an Environmental Health Science major in the Gillings School of Global Public Health and previously served as Co-President of the Campus Y.
3. I grew up in England, but I knew I wanted to come to an American university. I always appreciated the liberal arts curriculum offered in the U.S., which is not offered in the United Kingdom. It provides a diverse avenue of learning that cannot be obtained in England. I was drawn to Carolina, and I was awarded a Morehead-Cain scholarship to attend UNC-CH.

Experience at UNC-CH

4. I became involved in the Campus Y during my first year at UNC-CH. I have met so many amazing people who have brought so many different perspectives to the table. It has made me question my life experiences so far and what I want to do after I graduate.
5. The primary place where I have had the opportunity to interact with those who are different than me, including students from different races, has been through the Campus Y. I had a predominantly White upbringing and went to a predominantly White high school. I gained a lot of things from my high school experience but I did not have the chance to appreciate how someone’s life experience could be radically different based on their race. I never even considered the existence of a racist infrastructure, much less that we currently live in one. Through being friends with, and not simply interacting with, people who have had radically

different experiences because of race, I continue to have my eyes opened to the world around me and how it affects different people.

6. I have had tough conversations with a number of my friends of color about how UNC-CH's campus and the larger world have impacted them in different ways. One friend shared with me that sometimes people mistake her for another black woman. That has never happened to me. It is indicative of the society we live in, and a small microaggression like that can affect your self-worth and value. It is imperative that Carolina students know that, recognize that, and endeavor to be a better generation. We need to be more compassionate toward each other and avoid microaggressive behavior.

7. During my first year, I took a course on the politics of identity. We discussed questions such as whether we vote for people of the same race as our own and why. The class was very diverse, and I learned a great deal from listening to other students. Particularly as an international student, I learned about U.S. politics but also about how different races, ethnicities, and socioeconomic statuses are represented in the U.S. political system.

8. In all courses, hearing from classmates with different backgrounds adds value. Hearing other people's perspectives allows you to relate to them more and it causes you to think more. Some of my classes at UNC-CH have been much more diverse than others, and I learn so much from my classmates in the courses that are diverse.

9. One of the most important skills you can gain from going to college is the ability to relate to other students. It is important to have an understanding of what it is like to come from different experiences, and an appreciation for the fact that those experiences make you different and unique but you also learn that you are similar. It is imperative for students to have

cultural competency but, more importantly, empathy and compassion for people who have come from different experiences.

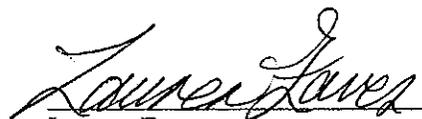
10. It should be a part of the University's responsibility to acknowledge lived experiences of students of different backgrounds. To not take that into consideration is to be willfully blind as to how students experience the first 18 years of their life. If a public university is about extending benefits to the State, part of UNC-CH's responsibility to the State is to ensure it takes into consideration the prior experiences of students in creating a class.

Conclusion

11. The University's diversity is one of its greatest strengths. I believe, and have seen first-hand, that diversity brings great benefits to the University and to its students. I am extremely grateful for the opportunity I have had to live and learn in a diverse community while in college.

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

Executed on: 06/18/17



Lauren Eaves

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DECLARATION OF KENDALL LUTON

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I, Kendall Luton, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am an African-American male at The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”).
2. I am a Journalism major in the Class of 2018.
3. At UNC-Chapel Hill, I am Vice Chair of the Undergraduate Honor Court and the Vice President of Every Nation Campus ministry. I have also served as a student assistant and volunteer for the Men of Color Engagement, a member of Carolina Mock Trial, a Counselor for UNC-Chapel Hill’s undergraduate Attorney General’s Staff, and a mentor to a low income, African-American student through the Buckley Public Service Scholars program.
4. After UNC-Chapel Hill, I plan to attend law school and become involved in local public service.

Diversity at UNC-Chapel Hill

5. I grew up in a small town outside of Pittsburgh, Pennsylvania. I grew up in a predominately white area around similar people with the same beliefs. It was an insular community.
6. At UNC-Chapel Hill, I was exposed to a wide range of different people. I was exposed to many people I would have never thought to talk to before coming to UNC-Chapel Hill.

7. Through my work with the Undergraduate Honor Court and with Men of Color Engagement, I was exposed to people with different religions and ethnicities. I did not always agree with their viewpoints, but I had the opportunity to sit down and talk with them to understand where they were coming from. Through meeting these people, I have a greater appreciation for the world we live in and have developed a different worldview.

8. My classes are sometimes diverse. I took a course on race, gender, and class in the Sociology Department. In that class, there were students who were straight, homosexual, Muslim, Christian, atheist, agnostic, Black, and White. We had heated debates, but all of the students respected each other. We spent time listening to each other. I learned how different people feel about pressing national issues.

9. On the other hand, there were several times when I was only one of two or three Black students in class. Whenever there was discussion in class about something happening in the Black community, people would ask or look to me for an explanation. There was an expectation that if I was a Black person in a predominantly White space, they would look to me to represent the entire Black community. I would not give into that and would not answer for the entire Black community.

10. My residence hall, Ehringhaus, was not particularly diverse. My roommate was also an African-American male, but everyone else was White.

11. At UNC-Chapel Hill, there are opportunities to interact with people from other backgrounds, but I had to be intentional about finding these opportunities. I found

that on campus, we organically tend to interact with people of the same race and religion. You can find diversity, but you have to be willing to look for it.

12. During my first two years at UNC-Chapel Hill, I only had one Black professor, Dr. Patricia Parker in the Department of Communications. That was a good experience. It was nice to feel like I had a professor who had a similar background to me. I have learned things from all of my professors, but having a Black professor allowed me to be more comfortable in class and with my studies.

13. As a Student Assistant for the Men of Color Engagement, I worked with Marcus Collins, the Dean for the Center for Student Success & Academic Counseling, and Christopher Faison, the Coordinator for the Men of Color Engagement. We examined retention and graduation rates for men of color. UNC-Chapel Hill is above the national average in retaining men of color, but the number is still lower than for other groups. We know we have to do better, and UNC-Chapel Hill is working on that issue. I believe that having more representation of Black males on campus would help.

Conclusion

14. There are good opportunities to interact with students from different backgrounds at UNC-Chapel Hill for those who are intentional about seeking out those opportunities. However, being a Black male on campus still poses real challenges due to the low number of diverse students. I would urge the Court to consider the importance of having racial diversity on campus.

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

Executed on: _____



Kendall Luton