

# EXHIBIT 2



COVID-19 and to avoid spreading it to others. I understand that social distancing involves keeping myself and my kids around six feet away from other people.

8. I also understand that staying at home and avoiding contact with people in general is the most effective way to avoid contracting COVID-19 and slow the spread of the virus.
9. The COVID-19 outbreak has made it almost impossible for me and my family to travel safely. I still have a suspended driver's license due to traffic tickets I still cannot afford to pay. As a result, I cannot legally drive and must ask others to drive me and my family when travel is necessary.

**Impact of COVID-19 on My Family's Health and Ability to Access Medical Care**

10. My children have asthma. I am especially worried about them because I have heard that having asthma puts people at a higher risk of getting sick from COVID-19.
11. Additionally, my youngest son, K.B., who is a toddler, sometimes has convulsions. Most recently, he had convulsions on March 29, 2020. Because I have a suspended driver's license, I had to ask a friend to take us to the hospital. During the rides to and from the hospital, none of us could socially distance.
12. I am unable to drive myself or my family to the hospital in case of an emergency. I would also be unable to drive myself to access non-emergency medical care such as COVID-19 testing, if it becomes necessary.
13. I am scared that not having a valid driver's license will make it difficult for me and my children to access necessary medical assistance in an emergency.

**The Impact of COVID-19 on My Ability to Travel to Work and  
Get Essential Supplies for Myself and My Family**

14. Since the COVID-19 outbreak began, I have continued to rely on others for travel to work and to grocery and convenience stores to pick up essential supplies for my family. I have no choice due to the ongoing suspension of my driver's license.
15. I do not take public transportation because it is nearly impossible to follow social distancing guidance on the bus. Also, bus lines are often not available to take me where I need to go.
16. I also avoid using taxis because they do not permit social distancing. Traveling by taxi requires getting into a tight space where many others have been seated and where I do not control cleanliness.
17. Overall, I secure around twelve car rides per week in order to travel to shop for essential supplies, get myself and my children to the day care they attend and where I work, and meet my family's needs. These rides put me and my children in close contact with two to three people on multiple occasions each week.
18. When my children and I get a car ride from another person, it is impossible to keep social distance from the person giving us the ride. While I ask the friends, family, and neighbors who provide me and my children rides to follow public health guidelines such as sanitizing their hands, there is no way for me to know if they are following these guidelines or if they have come into contact with the coronavirus.
19. As a result, I have to limit where my kids and I need to go to prevent us from getting exposed to the coronavirus. We would have greater flexibility and safety if I could legally drive.

20. It is not possible to walk to all the places I need to go to get supplies and carry enough supplies home.
21. Although I am trying to reduce the number of times I have to go outside to get supplies, my five-person family requires groceries, household supplies, diapers and baby wipes, personal care and hygiene products, milk products for my youngest son, and medicine.
22. Because I live paycheck to paycheck, I cannot afford to buy a large stock pile of supplies at once. So, I have to make several trips to get smaller batches of supplies. Because my four children are growing, we go through supplies quickly.

### **Car Insurance and Continued Driver's License Suspension**

23. With money I recently received from my tax refund, I was able to purchase a used car and the insurance for the car.
24. But I am unable to drive the car because I still owe money for traffic tickets and DMV reinstatement fees.
25. If the DMV were to remove the failure-to-pay suspensions from my license, I would be able to drive my car and could reduce my in-person contacts with people. This would make me and my family safer.
26. I know that hundreds, if not thousands of people in South Carolina are in a similar situation as me because their driver's licenses are suspended for unpaid traffic tickets. This makes it harder to travel for health care, meet basic needs, and look for or travel to work at a time when we need to use social distancing to keep ourselves and our families safe, healthy, and alive.
27. It is important to me to help people in South Carolina who are in a similar situation as me.

28. The harms that others and I experience from the suspension of our driver's licenses for unpaid traffic tickets are even worse during this COVID-19 health crisis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed in Conway, South Carolina.

Executed on April 7, 2020

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Emily Bellamy

**Reader's Declaration**

I, Amreeta S. Mathai, certify under penalty of perjury under the laws of the United States that on April 7, 2020, I read the attached declaration to plaintiff Emily Bellamy, and she has indicated to me that its contents are true and correct.

s/Amreeta S. Mathai  
Amreeta S. Mathai, NY Reg. No. 5169479

Dated this 10th day of April, 2020.