

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

KELLY BUTLER, on his own behalf and as the natural parent and next friend of his minor children, H.B. and P.B.; JASON CARR and SHARONA CARR, on their own behalf and as the natural parents and next friends of their minor children, L.C., and D.C.

Plaintiffs,

v.

SMITH COUNTY BOARD OF EDUCATION; BARRY H. SMITH, in his official capacity as Director of Schools of the Smith County School District; KELLY BELL, in her official capacity as Principal of Smith County Middle School; and DUSTY WHITAKER, in his official capacity as Principal of Smith County High School,

Defendants.

Civil No.: 2:19-cv-00091

Judge: Waverly D. Crenshaw, Jr.

Magistrate Judge:

**DECLARATION OF SHARONA CARR IN SUPPORT
OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Sharona Carr, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am one of the Plaintiffs in the above-captioned case. I am suing individually (on behalf of myself) and on behalf of my minor children, L.C. and D.C.,¹ who are currently enrolled in Smith County High School and Smith County Middle School, respectively. In addition, I have one other child enrolled in Carthage Elementary School.

¹ Per the Middle District of Tennessee User Manual, Version 6.2.3, Chapter 3, Section V(B) and the Amended Practices and Procedures for Electronic Case Filing, dated Aug. 21, 2015, Section 5.10(b), this declaration refers to the minor Plaintiffs by their initials.

2. My husband and I are atheists. We have raised our children to be non-believers as well.

3. Smith County School System officials have repeatedly subjected my children to prayer, proselytizing, and other promotion of religion. In most instances, these activities explicitly promote Christianity.

4. I have witnessed at least two instances in which school officials have promoted religion.

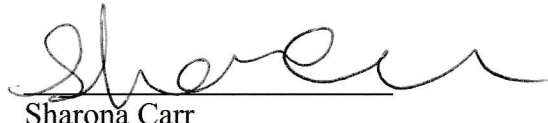
5. First, along with my husband and two younger children, I attended the May 2019 Smith County Middle School graduation for my daughter, L.C. That event included a Christian prayer.

6. Second, during a visit to Smith County High School this year, I encountered a decorative sign in a bathroom designated for visitors. The sign featured a Latin cross and stated, “‘With God all things are possible.’ Matthew 19:26” A true and correct copy of a photograph of the sign is attached as Exhibit A.

7. My husband and I value our right to direct our children’s religious education. In imposing religious exercise on our children and promoting religion to them, school officials have usurped that right for themselves.

8. We do not consent to school officials’ imposition of religious exercise and messages on our children. We are deeply offended by school officials’ prayer and proselytizing, and these unwelcome practices have caused our family to feel like second-class, disfavored members of the school community. My husband and I, and our children, have felt coerced into joining prayers and have experienced pressure more generally to adopt officials’ favored religious beliefs.

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

A handwritten signature in black ink, appearing to read "Sharona Carr", written over a horizontal line.

Sharona Carr

Executed this 15th day of November, 2019