

IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT,
IN AND FOR LEON COUNTY, FLORIDA

RENE ROMO, ET AL.

PLAINTIFFS,

VS.

KEN DETZNER AND PAM BONDI,

DEFENDANTS.

CASE No.: 2012-CA-00412

THE LEAGUE OF WOMEN VOTERS OF FLORIDA,
ET AL.,

PLAINTIFFS,

VS.

KEN DETZNER, ET AL.,

DEFENDANTS.

CASE No.: 2012-CA-00490

COALITION PLAINTIFFS' NOTICE OF SERVICE
(.doj) OF PROPOSED REMEDIAL CONGRESSIONAL PLANS

Coalition Plaintiffs hereby give notice of the service (in native .doj format) of their Alternative Remedial Maps (CP-1, CP-2, and CP-3), and disclose the individuals who were involved in drawing, reviewing, directing, or approving the Alternative Remedial Maps, as follows:

Coalition Plaintiffs' proposed remedial Congressional plan **CP-1** is identical to the last plan passed by the House during the August 2015 special session (c9071), except that it offers an alternative configuration of Congressional Districts 20, 21, 22, 23, 24, 25, 26 and 27 in South Florida that eliminates the Tier-1 violation in Congressional Districts 26 and 27, that results in the same or increased compactness in seven out of eight of the districts, and that has seven fewer city splits than either the House plan (c9071) or the Senate plan (c9062).

Coalition Plaintiffs' proposed remedial Congressional plan **CP-2** is identical to the last plan passed by the House during the August 2015 special session (c9071), except that it offers an alternative configuration of Congressional Districts 26 and 27 that eliminates the Tier-1 violation in those districts, that maintains nearly identical compactness scores, and that has the same number of city and county splits as the House and Senate plans.

Coalition Plaintiffs' proposed remedial Congressional plan **CP-3** is also identical to the last plan passed by the House during the August 2015 special session (c9071), except that it offers a second alternative configuration of Congressional Districts 26 and 27 that eliminates the Tier-1 violation in those districts, that maintains nearly identical compactness scores, and that has the same number of city and county splits as the House and Senate plans.

Coalition Plaintiffs' Alternative Remedial Maps (CP-1, CP-2 and CP-3) were drawn by John O'Neill, a mapping software technician employed by Strategic Telemetry, located in Washington, D.C. Mr. O'Neill drew the remedial plans in coordination with, and at the direction of, Fritz S. Wermuth of King, Blackwell, Zehnder & Wermuth, P.A., legal counsel for Coalition Plaintiffs. David B. King, Thomas A. Zehnder, and Vincent Falcone III of King, Blackwell, Zehnder & Wermuth, P.A. also reviewed the Alternative Remedial Maps and provided additional, albeit limited, direction in the drawing process. Allan J. Lichtman, PhD, a Distinguished Professor at American University, reviewed, assessed, and analyzed the minority districts in the Alternative Remedial Plans, as will be reflected in his forthcoming Expert Report. Finally, the Alternative Remedial Maps were reviewed and approved by Ellen Freidin, Esquire, legal advisor for the League of Women Voters of Florida and Common Cause; Pamela Goodman, President of the LOWV; and Peter Butzin, Volunteer State Chair (Florida) of Common Cause.

Dated: September 14, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 14, 2015 I filed the foregoing using the State of Florida ePortal Filing System, which will serve a copy by email on all counsel listed on the Service List below.

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