

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GLORIA PERSONHUBALLAH, et al,

Plaintiffs,

v.

JAMES B. ALCORN, et al.,

Defendants &
Intervenor-Defendants

Civil Action No. 3:13cv00678

**DECLARATION OF KEVIN J. HAMILTON IN SUPPORT OF PLAINTIFFS’
RESPONSE TO OTHER PARTIES’ SUBMISSIONS ON FINAL REPORT OF
SPECIAL MASTER**

I, Kevin J. Hamilton, have personal knowledge of the matters set forth in this declaration and, if sworn as a witness, would testify as follows:

1. I am an attorney practicing at the firm of Perkins Coie LLP and am lead counsel for the plaintiffs in this matter.
2. Attached as Exhibit A is a true and correct copy of a report titled “Measures of Compactness,” generated using data files for the enacted plan, available on the Division of Legislative Services redistricting website.
3. Attached as Exhibit B is a true and correct copy of a report titled “Measures of Compactness,” generated using data files for the Special Master’s “Congressional Plan Modification 16,” available on the Division of Legislative Services redistricting website.

4. Attached as Exhibit C is a true and correct copy of a report titled “Measures of Compactness,” generated using data files for the Special Master’s “NAACP Plan Modification 6,” available on the Division of Legislative Services redistricting website.

5. The following table summarizes the data contained in Exhibits A-C. The bolded text reflects the district that is the most compact using the Reock measure of compactness.

Measures of Compactness (Reock)					
District	Enacted	Congressional Modification Plan 16	NAACP Modification Plan 6	Intervenor Plan 1	Intervenor Plan 2
1	0.28	0.35	0.34	0.28	0.28
2	0.27	0.30	0.31	0.27	0.27
3	0.19	0.43	0.59	0.20	0.25
4	0.32	0.41	0.37	0.32	0.31
7	0.30	0.29	0.28	0.29	0.40

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

Executed this 1st day of December, 2015 in Seattle, Washington.



Kevin J. Hamilton

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of December, 2015, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

Respectfully submitted,

By /s/ John K. Roche

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Attorneys for Plaintiffs

EXHIBIT A

Plan Name: VACD2012

Plan Type:

Date: 9/11/2015

Time: 7:52:55PM

Administrator:

Measures of Compactness

9/11/2015

Sum	N/A	N/A	N/A
Min	0.19	1.76	0.08
Max	0.37	3.07	0.26
Mean	0.28	2.33	0.16
Std. Dev.	0.05	0.42	0.05

DISTRICT	Reock	Schwartzberg	Polsby-Popper
5101	0.28	2.09	0.18
5102	0.27	2.09	0.20
5103	0.19	3.07	0.08
5104	0.32	2.04	0.20
5105	0.30	2.30	0.15
5106	0.26	2.17	0.16
5107	0.30	2.34	0.13
5108	0.37	1.76	0.26
5109	0.20	2.13	0.18
5110	0.29	2.60	0.12
5111	0.23	3.06	0.09

EXHIBIT B

Plan Name: Current Congressional Plan Modification 16
Plan Type:
Date: 11/30/2015
Time: 9:09:15AM
Administrator:

Measures of Compactness

11/30/2015

Sum	N/A	N/A
Min	0.20	0.09
Max	0.43	0.26
Mean	0.31	0.19
Std. Dev.	0.07	0.05

DISTRICT	Reock	Polsby- Popper
5101	0.35	0.23
5102	0.30	0.22
5103	0.43	0.23
5104	0.41	0.21
5105	0.30	0.15
5106	0.26	0.16
5107	0.29	0.20
5108	0.37	0.26
5109	0.20	0.18
5110	0.29	0.12
5111	0.23	0.09

EXHIBIT C

Plan Name: NAACP Plan Modification 6

Plan Type:

Date: 11/30/2015

Time: 9:07:32AM

Administrator:

Measures of Compactness

11/30/2015

Sum	N/A	N/A
Min	0.20	0.09
Max	0.59	0.37
Mean	0.32	0.20
Std. Dev.	0.10	0.07

DISTRICT	Reock	Polsby-Popper
5101	0.34	0.20
5102	0.31	0.20
5103	0.59	0.37
5104	0.37	0.23
5105	0.30	0.15
5106	0.26	0.16
5107	0.28	0.17
5108	0.37	0.26
5109	0.20	0.18
5110	0.29	0.12
5111	0.23	0.09
