

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

GLORIA PERSONHUBALLAH, et al,)	
)	
Plaintiffs,)	
)	
v.)	
)	
JAMES B. ALCORN, et al.,)	Civil Action No. 3:13cv00678
)	
Defendants &)	
Intervenor-Defendants)	
)	

**DECLARATION OF KEVIN J. HAMILTON IN SUPPORT OF PLAINTIFFS’
PROPOSED REMEDIAL PLAN**

I, Kevin J. Hamilton, state that I 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 served as a lead counsel for the plaintiffs in this matter.
2. Attached as Exhibit A is a true and correct copy of a map of all eleven districts in Plaintiffs’ proposed remedial plan.
3. Attached as Exhibit B is a true and correct copy of a map of CD 3 in Plaintiffs’ proposed remedial plan, and a map showing CD3 as enacted by the General Assembly that was addressed by the Court’s decision in this case.
4. Attached as Exhibit C is a true and correct copy of a District Population Summary for Plaintiffs’ proposed remedial plan.

5. Attached as Exhibit D is a true and correct copy of a Measures of Compactness report for Plaintiffs' proposed remedial plan.

6. Attached as Exhibit E is a true and correct copy of a Political Subdivisions Split Between Districts report for Plaintiffs' proposed remedial plan.

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

Executed this 18th day of September, 2015 in Seattle, Washington.



Kevin J. Hamilton

EXHIBIT A

Declaration of Kevin J. Hamilton in Support of Plaintiffs' Proposed Remedial Plan

Plaintiffs' Remedial Plan

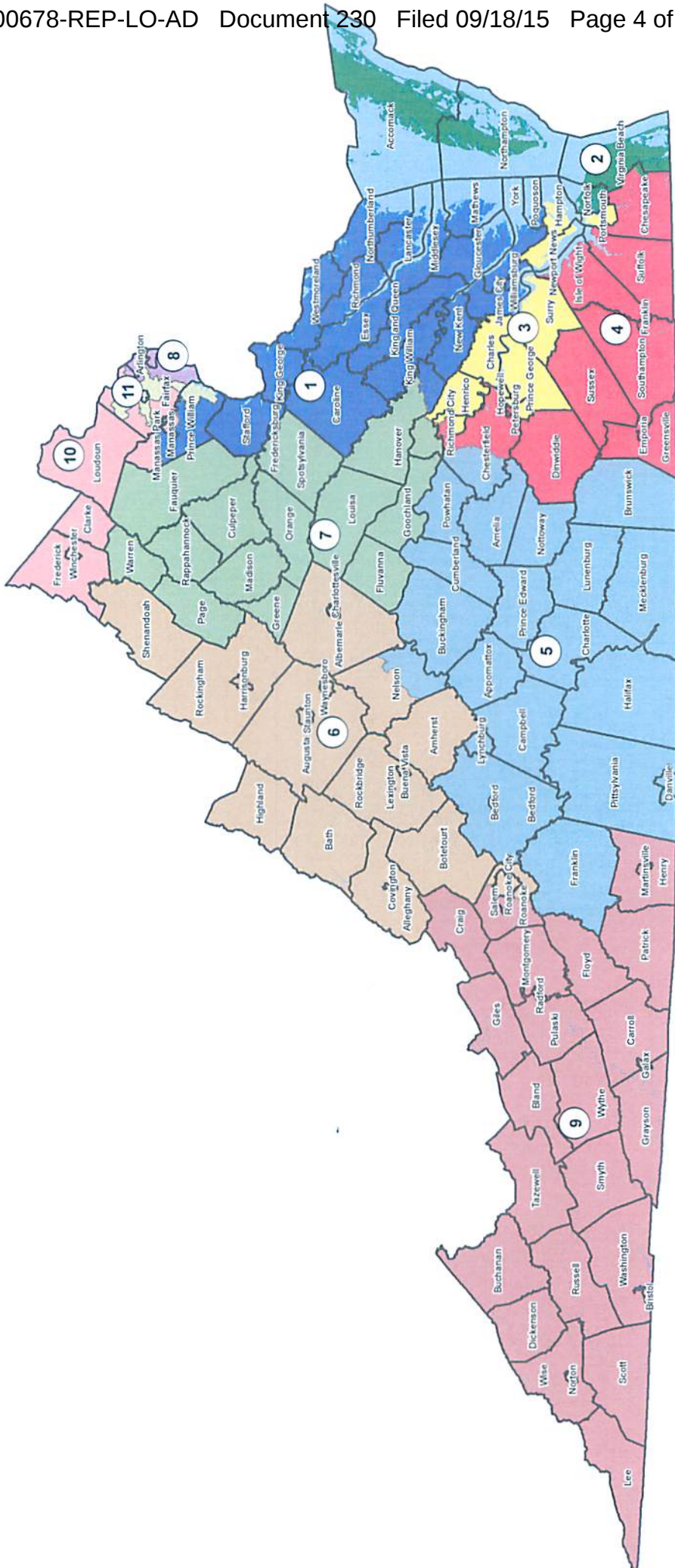
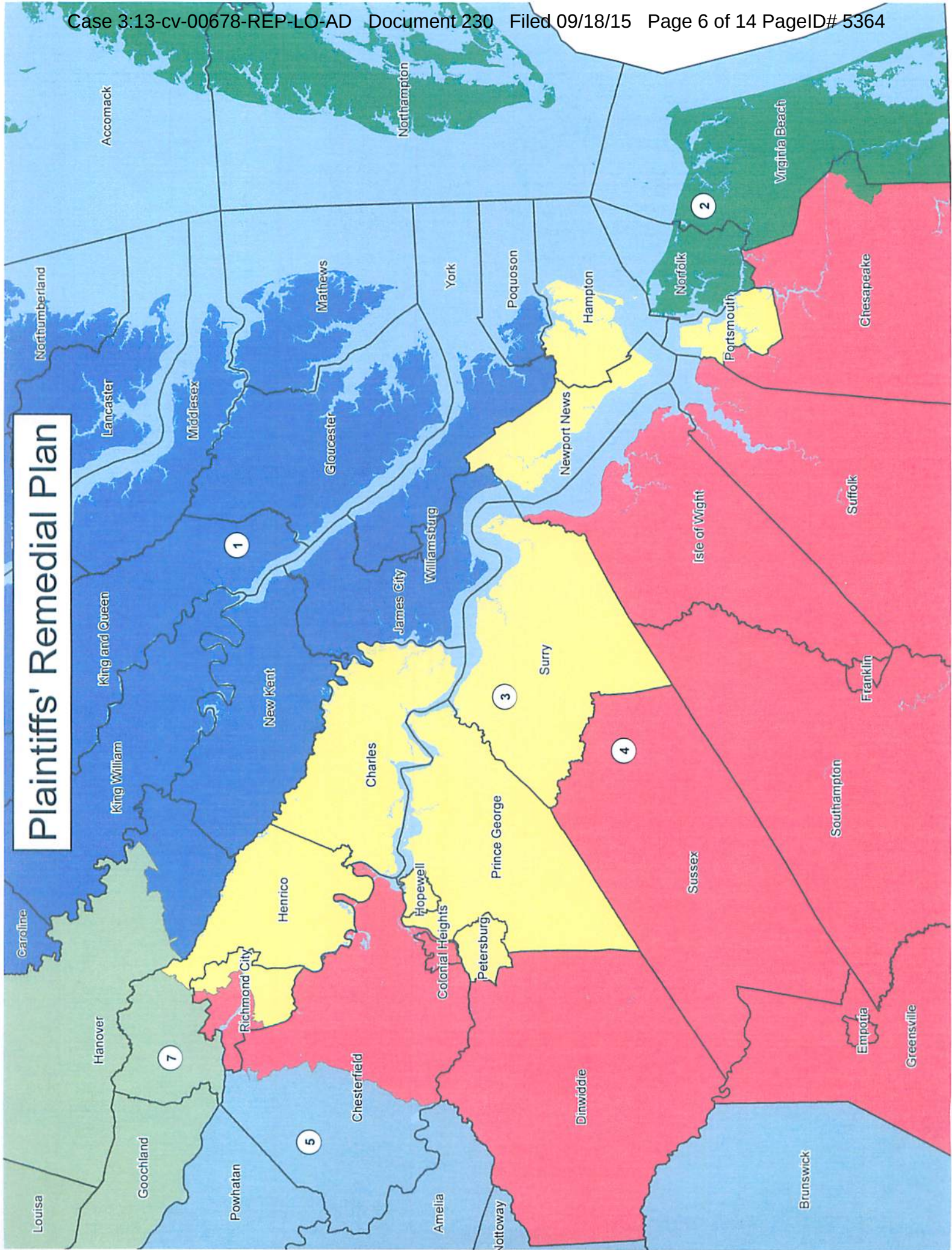
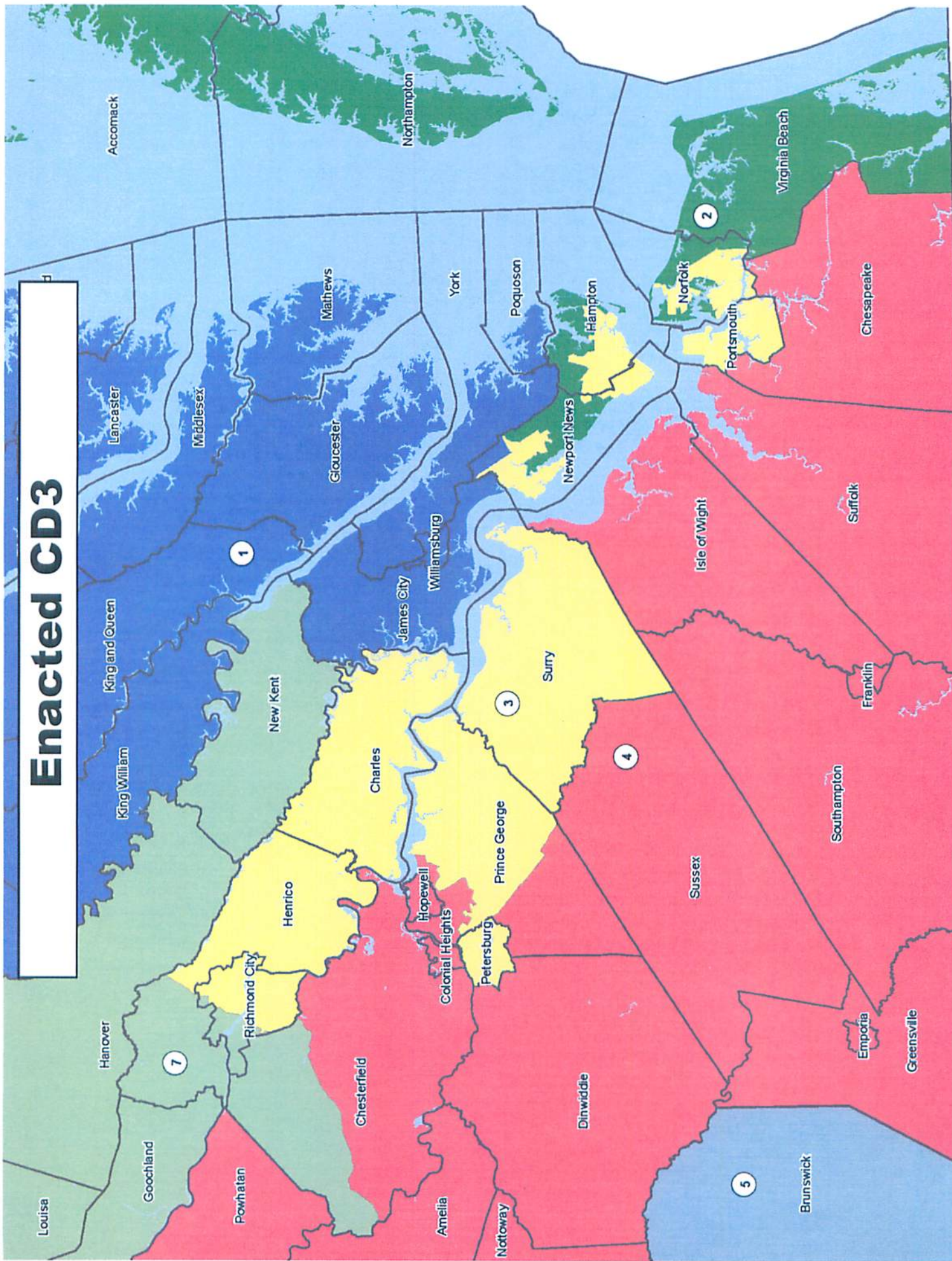


EXHIBIT B

Declaration of Kevin J. Hamilton in Support of Plaintiffs' Proposed Remedial Plan

Plaintiffs' Remedial Plan





Enacted CD3

EXHIBIT C

Declaration of Kevin J. Hamilton in Support of Plaintiffs' Proposed Remedial Plan

Plaintiffs' Remedial Plan District Population Summary

CD	Total		%		Black (alone or in-part)		% Black (alone or in-part)		Total		%		Asian		HawPI		Other	
	Population	Deviation	White	% White	Black	% Black	Hispanic	% Hispanic	AIAN	% AIAN	Asian	% Asian	HawPI	% HawPI	Other	% Other		
1	727,366	0	534,929	73.5%	129,723	17.8%	125,519	17.3%	57,497	7.9%	6,640	0.9%	28,963	4.0%	947	0.1%	24,706	3.4%
2	727,366	0	440,754	60.6%	218,151	30.0%	211,999	29.1%	48,883	6.7%	5,999	0.8%	41,483	5.7%	1,486	0.2%	17,681	2.4%
3	727,366	0	284,406	39.1%	401,928	55.3%	394,313	54.2%	39,979	5.5%	5,807	0.8%	14,963	2.1%	1,095	0.2%	18,183	2.5%
4	727,366	0	443,484	61.0%	238,654	32.8%	234,402	32.2%	36,931	5.1%	4,941	0.7%	21,822	3.0%	725	0.1%	16,800	2.3%
5	727,366	0	533,109	73.3%	170,128	23.4%	168,238	23.1%	17,668	2.4%	3,996	0.5%	11,421	1.6%	338	0.0%	7,855	1.1%
6	727,365	-1	606,658	83.4%	81,124	11.2%	79,277	10.9%	34,555	4.8%	4,553	0.6%	17,346	2.4%	437	0.1%	16,624	2.3%
7	727,366	0	572,847	78.8%	102,120	14.0%	99,501	13.7%	37,373	5.1%	4,725	0.6%	29,109	4.0%	613	0.1%	17,029	2.3%
8	727,366	0	454,669	62.5%	109,721	15.1%	105,900	14.6%	135,594	18.6%	5,554	0.8%	89,760	12.3%	962	0.1%	63,612	8.7%
9	727,366	0	662,505	91.1%	43,867	6.0%	43,023	5.9%	14,526	2.0%	3,524	0.5%	9,979	1.4%	260	0.0%	6,885	0.9%
10	727,365	-1	527,743	72.6%	57,244	7.9%	54,611	7.5%	85,367	11.7%	4,011	0.6%	96,867	13.3%	778	0.1%	38,400	5.3%
11	727,366	0	425,748	58.5%	100,903	13.9%	96,820	13.3%	123,452	17.0%	5,246	0.7%	137,228	18.9%	957	0.1%	54,161	7.4%

CD	Voting Age		% VAP		VAP Black (AP)		% VAP Black		VAP Hispanic		% VAP Hispanic		VAP Asian		% VAP Asian		VAP Other	
	Persons	Deviation	White	% White	Black (AP)	% Black (AP)	VAP Black	% VAP Black	VAP Hispanic	% VAP Hispanic	VAP Asian	% VAP Asian	VAP Other	% VAP Other				
1	544,677	0	411,095	75.5%	91,352	16.8%	89,199	16.4%	36,471	6.7%	4,730	0.9%	20,079	3.7%	621	0.1%	15,922	2.9%
2	561,930	0	355,377	63.2%	155,880	27.7%	152,605	27.2%	32,976	5.9%	4,676	0.8%	31,362	5.6%	1,097	0.2%	12,387	2.2%
3	555,714	0	234,513	42.2%	290,625	52.3%	286,228	51.5%	27,029	4.9%	4,523	0.8%	11,679	2.1%	765	0.1%	12,933	2.3%
4	558,256	0	352,530	63.1%	173,461	31.1%	171,171	30.7%	24,005	4.3%	3,680	0.7%	16,341	2.9%	474	0.1%	11,126	2.0%
5	566,511	0	422,535	74.6%	127,399	22.5%	126,278	22.3%	11,503	2.0%	3,062	0.5%	7,847	1.4%	240	0.0%	5,098	0.9%
6	576,740	-1	490,305	85.0%	57,922	10.0%	56,805	9.8%	22,532	3.9%	3,449	0.6%	13,543	2.3%	330	0.1%	10,750	1.9%
7	549,339	0	440,621	80.2%	73,081	13.3%	71,690	13.1%	23,810	4.3%	3,443	0.6%	20,299	3.7%	426	0.1%	10,893	2.0%
8	580,212	0	375,269	64.7%	82,025	14.1%	79,591	13.7%	98,819	17.0%	4,213	0.7%	69,715	12.0%	738	0.1%	46,039	7.9%
9	584,562	0	535,654	91.6%	33,082	5.7%	32,529	5.6%	9,567	1.6%	2,845	0.5%	8,117	1.4%	209	0.0%	4,412	0.8%
10	520,811	-1	387,308	74.4%	38,233	7.3%	36,962	7.1%	55,325	10.6%	2,706	0.5%	65,528	12.6%	541	0.1%	25,026	4.8%
11	548,595	0	334,137	60.9%	69,494	12.7%	67,339	12.3%	84,820	15.5%	3,592	0.7%	101,292	18.5%	710	0.1%	37,301	6.8%

EXHIBIT D

Declaration of Kevin J. Hamilton in Support of Plaintiffs' Proposed Remedial Plan

Plan Name: Plaintiffs' Remedial Plan
 Plan Type:
 Date: 9/17/2015
 Time: 4:35:39PM
 Administrator:

Measures of Compactness

9/17/2015

Sum	N/A	N/A	N/A
Min	0.23	1.62	0.09
Max	0.49	3.06	0.33
Mean	0.32	2.08	0.22
Std. Dev.	0.09	0.46	0.08

DISTRICT	Reock	Schwartzberg	Polsby-Popper
5101	0.29	1.93	0.21
5102	0.26	1.64	0.33
5103	0.24	2.51	0.12
5104	0.36	2.09	0.20
5105	0.49	1.62	0.32
5106	0.32	2.00	0.20
5107	0.48	1.71	0.29
5108	0.37	1.76	0.26
5109	0.23	1.96	0.22
5110	0.29	2.60	0.12
5111	0.23	3.06	0.09

EXHIBIT E

Declaration of Kevin J. Hamilton in Support of Plaintiffs' Proposed Remedial Plan

Plan Name: Plaintiffs' Remedial Plan
 Plan Type:
 Administrator:

Political Subdivisions Split Between Districts

Thursday, September 17, 2015

4:29 PM

Number of subdivisions not split:

County	122
Voting District	2,355

Number of subdivisions split into more than one district:

County	12
Voting District	18

Number of subdivision splits which affect *no* population:

County	3
Voting District	8

Split Counts

County

Cases where an area is split among 2 Districts: 10

Cases where an area is split among 3 Districts: 2

Voting District

Cases where an area is split among 2 Districts: 18

County	Voting District	District	Population
<i>Split Counties :</i>			
Chesapeake City VA		5102	1,016
Chesapeake City VA		5104	221,193
Chesterfield VA		5104	195,992
Chesterfield VA		5105	120,244
Fairfax VA		5108	367,441
Fairfax VA		5110	186,406
Fairfax VA		5111	527,879
Hanover VA		5101	36,547
Hanover VA		5107	63,316
Henrico VA		5103	91,917
Henrico VA		5107	215,018
Isle of Wight VA		5103	0
Isle of Wight VA		5104	35,270
James City VA		5101	67,009
James City VA		5103	0
Nelson VA		5105	5,064
Nelson VA		5106	9,956

Plan Name: Plaintiffs' Remedial Plan
Plan Type:

Administrator:
User:

County	Voting District	District	Population
<i>Split Counties (continued):</i>			
Prince William VA		5101	167,068
Prince William VA		5110	58,012
Prince William VA		5111	176,922
Richmond City VA		5103	116,709
Richmond City VA		5104	87,505
Roanoke VA		5106	61,446
Roanoke VA		5109	30,930
Suffolk City VA		5103	0
Suffolk City VA		5104	84,585
<i>Split VTDs :</i>			
Chesapeake City VA	Hickory Grove	5102	1,016
Chesapeake City VA	Hickory Grove	5104	4,520
Chesterfield VA	Cranbeck	5104	696
Chesterfield VA	Cranbeck	5105	2,036
Fairfax VA	Magarity	5108	7,185
Fairfax VA	Magarity	5111	0
Fairfax VA	Old Mill	5110	3,036
Fairfax VA	Old Mill	5111	1,244
Fairfax VA	Saint Albans	5108	1,561
Fairfax VA	Saint Albans	5111	2,150
Hanover VA	Totopotomoy	5101	501
Hanover VA	Totopotomoy	5107	294
Henrico VA	Wilder	5103	1,958
Henrico VA	Wilder	5107	447
Isle of Wight VA	Bartlett	5103	0
Isle of Wight VA	Bartlett	5104	4,412
Isle of Wight VA	Carrollton	5103	0
Isle of Wight VA	Carrollton	5104	3,872
Isle of Wight VA	Rushmere	5103	0
Isle of Wight VA	Rushmere	5104	2,914
James City VA	Roberts B	5101	2,762
James City VA	Roberts B	5103	0
Nelson VA	Lovingston	5105	419
Nelson VA	Lovingston	5106	1,039
Prince William VA	Buckland Mills	5101	1,212
Prince William VA	Buckland Mills	5110	5,836
Richmond City VA	203	5103	1,197
Richmond City VA	203	5104	805
Roanoke VA	Botetourt Springs	5106	29
Roanoke VA	Botetourt Springs	5109	2,923
Suffolk City VA	Bennetts Creek	5103	0
Suffolk City VA	Bennetts Creek	5104	3,812
Suffolk City VA	Ebenezer	5103	0
Suffolk City VA	Ebenezer	5104	2,239
Suffolk City VA	Harbour View	5103	0
Suffolk City VA	Harbour View	5104	4,402