

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

GLORIA PERSONHUBALLAH, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No.: 3:13-cv-678
	)	
JAMES B. ALCORN, et al.,	)	
	)	
Defendants.	)	


**DECLARATION OF TREVOR S. COX**

I, Trevor S. Cox, state that the following facts are true to the best of my knowledge, information, and belief:

1. I am one of the attorneys of record for the Defendants in this matter and I have personal knowledge of the facts set forth in this declaration.
2. I prepared the "Summary Comparison of Plans" attached as Exhibit 1. It accurately reflects data for five Virginia congressional districts (CDs 1-4, 7) under the current plan and the two remedial plans proposed by the Special Master. The footnotes to the table show the sources from which the data were derived.

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

Executed on: December 1, 2015  
Richmond, Virginia

  
Trevor S. Cox

# **Exhibit 1**

**Summary Comparison of Plans**

	<b>Plan</b>	<b>BVAP<sup>1</sup></b>	<b>2008 Presidential Dem. Vote<sup>2</sup></b>	<b>Locality Splits<sup>3</sup></b>	<b>Compactness <i>Polsby - Popper / Reock<sup>4</sup></i></b>		<b>Core Preservation<sup>5</sup></b>
CD1	Enacted Plan	16.9%	45.8%	5	0.18	0.21	76.5%
	Cong. Modified 16	16.4%	43.8%	4	0.23	0.25	81.5%
	NAACP Modified 6	16.9%	44.4%	4	0.20	0.25	72.3%
CD2	Enacted Plan	21.3%	49.3%	3	0.21	0.21	85.0%
	Cong. Modified 16	19.8%	47.9%	3	0.22	0.20	83.1%
	NAACP Modified 6	17.7%	45.4%	2	0.20	0.22	66.5%
CD3	Enacted Plan	56.3%	77.6%	6	0.08	0.12	83.1%
	Cong. Modified 16	45.3%	65.4%	4	0.22	0.31	53.7%
	NAACP Modified 6	42.3%	64.8%	2	0.36	0.36	55.8%
CD4	Enacted Plan	31.3%	48.0%	4	0.20	0.20	96.2%
	Cong. Modified 16	40.9%	60.1%	4	0.20	0.26	52.1%
	NAACP Modified 6	42.0%	62.2%	5	0.22	0.25	54.7%
CD7	Enacted Plan	14.6%	42.8%	4	0.13	0.20	88.1%
	Cong. Modified 16	18.0%	44.9%	3	0.20	0.26	76.8%
	NAACP Modified 6	21.3%	46.2%	3	0.17	0.25	67.5%

<sup>1</sup> The BVAP figures for congressional districts under the Enacted Plan are taken from documentation posted on the website of the Division of Legislative Services in connection with the Enacted Plan, 2012 HB 251. See [http://redistricting.dls.virginia.gov/2010/data/congressional%20plans/2012%20HB251\\_Bell/HB251\\_Bell.pdf](http://redistricting.dls.virginia.gov/2010/data/congressional%20plans/2012%20HB251_Bell/HB251_Bell.pdf) at 3 (“Voting Age Population”). The BVAP figures for congressional districts under the Special Master’s proposed plans are taken from the accompanying data files (available at <http://redistricting.dls.virginia.gov/2010/court-ordered-redistricting.aspx>). See Current Congressional Modification 16 data tables.pdf at 4 (“Voting Age”); NAACP Modified #6 Revised data tables.pdf at 3 (“Voting Age”).

<sup>2</sup> The BVAP figures for congressional districts under the Enacted Plan are taken from documentation posted on the website of the Division of Legislative Services in connection with the Enacted Plan, 2012 HB 251. See [http://redistricting.dls.virginia.gov/2010/data/congressional%20plans/2012%20HB251\\_Bell/HB251\\_Bell.pdf](http://redistricting.dls.virginia.gov/2010/data/congressional%20plans/2012%20HB251_Bell/HB251_Bell.pdf) at 4 (“Election Data”). The BVAP figures for congressional districts under the Special Master’s proposed plans are taken from the accompanying data files (available at <http://redistricting.dls.virginia.gov/2010/court-ordered-redistricting.aspx>). See Current Congressional Modification 16 data tables.pdf at 2 (“Election data”); NAACP Modified #6 Revised data tables.pdf at 4 (“Election data”).

<sup>3</sup> Data in this column are taken from Table 4, Report of Special Master at 60.

<sup>4</sup> Data in this column are taken from Table 3, Report of Special Master at 60.

<sup>5</sup> Core preservation percentages for congressional districts under the Enacted Plan are from Intervenor-Defendants’ Trial Exhibit 27. Core preservation percentages for congressional districts under the Special Master’s two proposed plans were calculated from the accompanying data files (available at <http://redistricting.dls.virginia.gov/2010/court-ordered-redistricting.aspx>). See current cong Mod 16 Core Constituency.pdf (“Table 2 – Core Constituency Report”); NAACP Modified #6 Revised core constituency.pdf (“Core Constituency Report”). The percentages were calculated by dividing the total unchanged population (“Total Unchanged Area”) by the total population (“Total Population”).