

Exhibit 3

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN

-----X
TIM HARKENRIDER, GUY C. BROUGHT,
LAWRENCE CANNING, PATRICIA CLARINO,
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA
FANTON, JERRY FISHMAN, JAY FRANTZ,
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN
ROWLEY, JOSEPHINE THOMAS, AND MARIANNE
VIOLANTE,

Index No. E2022-0116CV

Petitioners,

-against-

GOVERNOR KATHY HOCHUL, LIEUTENANT
GOVERNOR AND PRESIDENT OF THE SENATE
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER
AND PRESIDENT PRO TEMPORE OF THE SENATE
ANDREA STEWART-COUSINS, SPEAKER OF THE
ASSEMBLY CARL HEASTIE, NEW YORK STATE
BOARD OF ELECTIONS, AND THE NEW YORK
STATE LEGISLATIVE TASK FORCE ON
DEMOGRAPHIC RESEARCH AND
REAPPORTIONMENT,

Respondents.

-----X
PETITIONERS' MEMORANDUM REGARDING PROPOSED REMEDIAL MAP

TROUTMAN PEPPER HAMILTON
SANDERS LLP

Bennet J. Moskowitz, Reg. No. 4693842
875 Third Avenue
New York, New York 10022
(212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St., Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

KEYSER MALONEY &
WINNER LLP

George H. Winner, Jr., Reg. No. 1539238
150 Lake Street
Elmira, New York 14901
(607) 734-0990
gwinner@kmw-law.com

HOWARD HINMAN &
KATTELL LLP

Richard C. Lewis
700 Security Mutual Building
80 Exchange Street
Binghamton, NY 13901
(607) 231-6605
rlewis@hbk.com

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DISCUSSION

New York's Constitution requires that:

- Each district “shall contain as nearly as may be an equal number of inhabitants,” N.Y. Const. art. III, § 4(c)(2)
- Each district be contiguous, *id.* § 4(c)(3);
- Mapdrawers “consider the maintenance of cores of existing districts, of pre-existing political subdivisions, including counties, cities, and towns, and of communities of interest,” *id.* § 4(c)(5);
- Each district “be as compact in form as practicable,” *id.* § 4(c)(4); and
- Mapdrawers “consider whether such lines would result in the denial or abridgement of racial or language minority voting rights,” precluding mapdrawers from drawing districts for the purpose of, or resulting in, “the denial or abridgement of such rights,” *id.* § 4(c)(1).
- Congressional districts cannot “be drawn to discourage competition or for the purpose of favoring or disfavoring incumbents or other particular candidates or political parties,” *id.* § 4(c)(5).

The proposed remedial map submitted by Petitioners complies with each of these requirements.

I. The Remedial Report Of Sean Trende Shows That Petitioners’ Proposed Remedial Map Complies With New York’s Constitutional Requirements For Redistricting

Petitioners’ Proposed Remedial Map complies with all of the measurable constitutional requirements, avoiding the unconstitutional infirmity in the Legislature’s 2022 enacted congressional map.

First, as Mr. Trende’s Remedial Report (“Trende.Rem.Rep.”) explains, all of the districts in the Proposed Map are contiguous, N.Y. Const. art. III, § 4(c)(3), and as equipopulous as possible, *id.* § 4(c)(2). As the chart on page 1 of Mr. Trende’s Remedial Report shows, all Proposed Congressional Districts except for Proposed CDs 18, 25, and 26 have 776,971 residents, while Proposed CDs 18, 25, and 26 each have 776,972. Trende.Rem.Rep.1. Thus, Petitioners’

Proposed Remedial Map has a maximum deviation of 1 resident between districts, the minimum possible.

Second, Petitioners' Proposed Remedial Map adequately respects and maintains "existing political units," with limited county splits. As Mr. Trende's Remedial Report shows, Petitioners' Proposed Remedial Map splits only 19 counties across the State, identical to the number of counties split by the 2012 congressional map, and far fewer than the Legislature's 2022 enacted map, which splits 34 counties. Trende.Rem.Rep.2. Furthermore, Petitioners' Proposed Remedial Map splits those counties only 36 times—effectively identical to the 2012 map's 37 county splits with one additional congressional district. Trende.Rem.Rep.2. By comparison, the Legislature's 2022 enacted map included 56 county splits, over one-and-a-half times the number in Petitioners' Proposed Remedial Map. Trende.Rem.Rep.2.

Third, Petitioners' Proposed Remedial Map is "as compact in form as practicable," N.Y. Const. art. III, § 4(c)(4), surpassing the compactness score of the Legislature's 2022 enacted congressional map, and comparing favorably to the 2012 congressional map. Trende.Rem.Rep.2–3. Indeed, the Proposed Remedial Map is more compact than *both* the 2022 enacted congressional map and the 2012 congressional map in all compactness metrics. Trende.Rem.Rep.2–3. Moreover, if one wanted to look at the least compact district in each of the three maps, Petitioners' Proposed Remedial Map outpaces both of its comparators. Trende.Rem.Rep.3. This is also largely true when comparing the Proposed Remedial Map to the 2022 enacted congressional map district by district, with nearly all of the districts in the Proposed Remedial Map scoring better on compactness than the same district in the 2022 enacted congressional map. Trende.Rem.Rep.4.

Fourth, Petitioners' Proposed Remedial Map retains the cores of prior districts. N.Y. Const. art. III, § 4(c)(5). As Mr. Trende's analysis shows, the Proposed Remedial Map maintains

79% of the cores of the 2012 congressional map, greater than retained in the 2022 enacted congressional map, which had a retention score of 76.9%. Trende.Rem.Rep.4. Moreover, on a district-by-district basis, most of the individual districts in the Proposed Remedial Map score better on retention than their counterparts in the Legislature’s 2022 enacted congressional map. Trende.Rem.Rep.5.

Fifth, the Proposed Remedial Map respects “racial or language minority voting rights,” making sure not to draw districts that “den[y] or abridge[] . . . such rights.” N.Y. Const. art. III, § 4(c)(1). Although Petitioners did not draw their Proposed Remedial Map to predominate issues of race, that Map adequately respects New York’s racial diversity, and provides multiple minority-majority and minority-plurality districts. For example, the Proposed Remedial Map provides four districts where the Hispanic population has either a majority or strong plurality of the population, equal to the number in the Legislature’s 2022 enacted congressional map. Trende.Rem.Rep.6. Similarly, the Proposed Remedial Map provides three districts where African American residents are the majority or strong plurality of the population, same as the 2022 enacted congressional map. Trende.Rem.Rep.6. And the Proposed Remedial Map creates a strong plurality Asian American minority-majority district, the same as the 2022 enacted congressional map. Trende.Rem.Rep.6. Moreover, as further discussed below, *infra* pp.5–6, the Proposed Remedial Map also creates a new Orthodox Jewish interest district combining similar and related Orthodox communities together, further reflecting this map’s considerations of “racial or language minority rights.” N.Y. Const. art. III, § 4(c)(1).

Finally, Petitioners’ Proposed Remedial Map was not drawn “to discourage competition or for the purpose of favoring or disfavoring incumbents or other particular candidates or political parties,” N.Y. Const. art. III, § 4(c)(5), in contrast to the Legislature’s 2022 enacted congressional

map. Following the same analysis he did regarding that enacted map, Mr. Trende analyzed Petitioners' Proposed Remedial Map using his dotplot and Gerrymandering-Index methodologies, to determine whether the map showed signs of packing and cracking or attempts to diminish competition in the more competitive districts. Trende.Rem.Rep.6–8. The answer to both questions regarding the Proposed Remedial Map is a decisive no. In his dotplot analysis, Mr. Trende shows that the percentage of Democratic voters in all districts, ordered from most Republican to most Democratic, falls within the bands of simulated maps. Trende.Rem.Rep.7. This is evidence that districts were not drawn to decrease competition or protect one party or another. Turning to the Gerrymandering Index, the Index for the Proposed Remedial Map is 0.0705, close to but below the average Gerrymandering Index for the simulated maps of 0.0754, well within the range of what was expected. Trende.Rem.Rep.7–8. Thus, Mr. Trende's analysis showed that the Proposed Remedial Map did not violate the Constitution's prohibition against partisan gerrymandering either.

II. The Individual Districts

Congressional District 1

Proposed Congressional District 1 is compact and entirely within Suffolk County, consistent with this district from the 2012 map, maintaining all of the “core[] of [the] existing district[].” N.Y. Const. art. III, § 4(c)(5). Moreover, Proposed CD1 incorporates very few cuts within municipalities, best reflecting the maintenance of “cities, and towns, and of communities of interest” within the eastern Long Island community. *Id.*

Congressional District 2

Proposed Congressional District 2 covers portions of Suffolk County and Nassau County, largely consistent with this district from the 2012 map, *id.*, with the only changes being that it now extends slightly farther west into Nassau County, but only to address population-equality concerns.

Proposed CD2 is a compact district that combines the South Shore communities of interest without extending into Queens, consistent with voter concerns that combining these Nassau County communities with Queens made no sense as a matter of communities of interest. Public Comment of Lisa DelliPizzi (June 30, 2021); Public Comment of Margaret Kelly (Aug. 1, 2021).¹

Congressional District 3

Proposed Congressional District 3 covers portions of Nassau County and Suffolk County, wholly confined to the North Shore communities on Long Island, and maintains over 80% of the core of the 2012 district. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). This compact district reflects voter concerns that the North Shore region remain whole and not connected with unrelated communities in Queens. *See, e.g.,* Public Comment of Lisa DelliPizzi, *supra*; Public Comment of Margaret Kelly, *supra*. This proposed district also keeps together the communities of Islip, West Sayville, Sayville and Bayport, consistent with public testimony that such communities should remain together. Testimony of Edward O'Donnell, 20:35–23:13, Virtual Public Meeting of the NYSIRC, July 20, 2021.²

Congressional District 4

Proposed Congressional District 4 is a largely new district, drawn to reflect the growing Orthodox Jewish population in the region. Proposed CD4 combines heavily Orthodox communities in Brooklyn, Queens, and the Five Towns area, all of which have religious, cultural, and economic ties, making them clear communities of interest. *See* N.Y. Const. art. III, § 4(c)(5). Public testimony and evidence presented to the IRC showed a healthy appetite for keeping these similar communities together in one district, as they all share substantial relationships, especially

¹ Available at https://nyirc.gov/storage/archive/Suffolk_Nassau_Redacted.pdf.

² Available at <https://www.youtube.com/watch?v=DuWDR8GyaWo>.

on issues like “businesses, religious institutions, and social service providers,” Public Comment of Nachman Mostofsky (July 28, 2021); *see also* Public Comment of Rabbi Yeruchim Silber (July 29, 2021); Public Comment of Dr. Bernard Fryshman; Public Comment of Louis Jerome.³

Congressional District 5

Proposed Congressional District 5 covers a majority of the core of this district from the 2012 map. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD5 merely extends farther into Nassau County, in order to be consistent with the plurality of African American residents in the 2012 district, *see id.* at § 4(c)(1), as well as to meet population requirements and to compensate for keeping Proposed CD3 mostly in Suffolk County, without having to cross another county line.

Congressional District 6

Proposed Congressional District 6 is also largely consistent with the 2012 map, encompassing almost all of the core of the district from the 2012 congressional map. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD6 also maintains this district as an Asian American strong plurality district, consistent with how it was constituted in the 2012 map. *See Trende.Rem.Rep.6*; N.Y. Const. art. III, § 4(c)(1).

Congressional District 7

Proposed Congressional District 7 is consistent with the 2012 map, encompassing nearly the entire core of the district from the 2012 congressional map. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD7 treats the Hispanic communities consistently with the 2012 congressional map, *see Trende.Rem.Rep.6*; N.Y. Const. art. III, § 4(c)(1), and also reflects public testimony calling for Asian communities of interest in Brooklyn and Manhattan to be combined in

³ All available at https://nyirc.gov/storage/archive/Kings_Richmond_Redacted.pdf.

a single district, Public Statement of Dr. Wah Lee (July 29, 2021); *see also* Public Statement of Karen Zhou (July 29, 2021); Public Statement of Kay Wong (July 28, 2021).⁴

Congressional District 8

Proposed Congressional District 8 is largely consistent with the 2012 map, encompassing almost two-thirds of the core of that prior district. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD8 also continues as an African American minority-majority district, consistent with its treatment in the 2012 map. *See Trende.Rem.Rep.6*; N.Y. Const. art. III, § 4(c)(1).

Congressional District 9

Proposed Congressional District 9 is consistent with the 2012 map, encompassing over 80% of the core of that district. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD9 also treats the African American community within this district consistently with the 2012 congressional map. *See Trende.Rem.Rep.6*; N.Y. Const. art. III, § 4(c)(1).

Congressional District 10

Proposed Congressional District 10 is solely within Manhattan, or New York County, creating a compact district solely on that island, without any unnecessary county splits. *See* N.Y. Const. art. III, § 4(c)(5).

Congressional District 11

Proposed Congressional District 11 is consistent with the 2012 map, maintaining over 90% of the core of that district. *Trende.Rem.Rep.5*; N.Y. Const. art. III, § 4(c)(5). Proposed CD11 is predominantly situated in Staten Island, covering all of Richmond County with only a small portion crossing the Verrazano-Narrows Bridge into Brooklyn and Queens County. This compact

⁴ All available at https://nyirc.gov/storage/archive/Kings_Richmond_Redacted.pdf.

and cohesive district combines the Staten Island community with the portions of Brooklyn immediately surrounding the Verrazano-Narrows Bridge, consistent with public statements during the IRC proceedings. For example, voters explained that District 11, in its final form should continue the “bond” that has existed between these communities since “the construction of the Verrazano Bridge,” with that “bond” including “commerce, educational institutions and even familial” interests, as well as “children commuting across the bridge to attend wonderful schools on both sides.” Public Statement of Brian Doherty.⁵ Indeed, multiple New Yorkers explained that the new map should keep Congressional District 11 largely consistent with its prior footprint, as “Staten Island and Southwest Brooklyn, are neighboring communities connected via the Bridge, as well as being connected through the many educational institutions, families, friends, and businesses.” Public Statement of Barbara Slattery; *see also* Public Statement of Rocco Coluccio (Aug. 10, 2021) (existing congressional district “makes geographic sense”).⁶

Congressional District 12

Proposed Congressional District 12 is a highly compact district, Trende.Rem.Rep.4; N.Y. Const. art. III, § 4(c)(4), that maintains over half of its 2012 counterpart, Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Proposed CD12 is primarily a northwestern Queens district that extends into the east side of Manhattan only to the extent necessary to reach population.

Congressional District 13

Proposed Congressional District 13 is consistent with the prior map, maintaining 100% of the core of that prior district. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5).

⁵ Available at https://nyirc.gov/storage/archive/Kings_Richmond_Redacted.pdf.

⁶ All available at https://nyirc.gov/storage/archive/Kings_Richmond_Redacted.pdf.

Congressional District 14

Proposed Congressional District 14 is a compact district that maintains almost two-thirds of this district from the 2012 congressional map, including by connecting northern Queens and the eastern Bronx sections of New York City, which have long been related and connected by major bridges and thoroughfares. *See* Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Proposed CD14 also maintains the same concentration of Hispanic residents as the 2012 district. *See* Trende.Rem.Rep.6; N.Y. Const. art. III, § 4(c)(1).

Congressional District 15

Proposed Congressional District 15 is a compact district that maintains the entire core of the 2012 district. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Moreover, Proposed CD15 maintains the large Hispanic community that the 2012 congressional map encompassed, continuing to provide a Hispanic minority-majority district in Proposed CD15. *See* Trende.Rem.Rep.6; N.Y. Const. art. III, § 4(c)(1).

Congressional District 16

Proposed Congressional District 16 is a compact district that maintains over three-quarters of the core of the 2012 district. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Proposed CD16 encompasses all of southcentral Westchester County, as well as some of Riverdale and a small portion of the northern Bronx, only as needed for population equality purposes. Proposed CD16 is now largely centered on the more suburban communities at the southern edge of the Hudson Valley region. This is consistent with the public statements voters gave to the IRC, explaining that it made no sense for large portions of the Bronx to be connected with disparate communities in Westchester County for their representation in Washington, D.C. *See, e.g.,* Public Statement of Betty Berenson; Public Statement of Deborah Porder; Public Statement of Ellen Hendrickx; Public

Statement of Jenny Geer (Aug. 14, 2021); Public Statement of Maryellen Chomsky (Aug. 15, 2021); Public Statement of Susan H. van Dijk (Aug. 11, 2021); Public Statement of William H. Schrag.⁷ These voters explained that the suburban communities just north of the Bronx should all be combined as common areas in Westchester, as they are related “socio-economically and culturally” while all largely going to the same areas to “work, worship, shop, receive their medical care, go to the movies, play golf and tennis, go to restaurants, get their hair done and belong to sports clubs,” none of which they do in the Bronx. Public Statement of Deborah Porder, *supra*. This Proposed CD16 also unifies all of Greenburgh in the new district, consistent with other voter concerns during IRC public hearings. See Public Testimony of Peter Bernstein 36:30–38:45, Virtual Public Meeting of the NYSIRC, Aug. 2, 2021.⁸ Thus, Proposed CD16 reflects the numerous public comments providing that these largely suburban Hudson Valley towns should be consolidated in a single district, without an outsized portion belonging to New York City residents.

Congressional District 17

Proposed Congressional District 17 is compact, Trende.Rem.Rep.4; N.Y. Const. art. III, § 4(c)(5), and encompasses all of Putnam County, all of Rockland County, and parts of Dutchess County and northern Westchester County (only as needed for population purposes). This compact district is easier for any elected Representative to travel across and perform his or her necessary duties, with less long-distance travel to disparate and disconnected communities. Moreover, Proposed CD17’s combination of Putnam County and northern Westchester County reflects the public testimony explaining the longstanding connections between these related communities, with northern Westchester County sharing more economic and social connections with Putnam

⁷ All available at https://nyirc.gov/storage/archive/Mid-Hudson_Capital_Region_Redacted.pdf.

⁸ Available at <https://www.youtube.com/watch?v=7HgDIwfiMmw>.

County and southern Dutchess County than with southern Westchester County. Public Testimony of Sergio Esposito 1:28:40–1:30:55, Virtual Public Meeting of the NYSIRC, Aug. 2, 2021; *see* Public Testimony of Aiden Rowan 1:39:20–1:42:10, *id.*⁹

Congressional District 18

Proposed Congressional District 18 encompasses all of Orange County and Sullivan County, while also including related portions of Dutchess County and Ulster County. This district encompasses and reflects the growing Orthodox Jewish communities in these counties, *see* N.Y. Const. art. III, § 4(c)(5), combining them into a single district, consistent with the wishes of public commenters, Public Statement of Clay Boone; Public Statement of Councilman Robert Courtenay; Public Statement of Israel Weinstock;¹⁰ Public Testimony of James LoFranco 1:44:25–1:45:41, Virtual Public Meeting of the NYSIRC, Aug. 2, 2021;¹¹ Indeed, these Orthodox communities share the same “economic and social concerns” while also utilizing the same businesses, “health care and social services organizations and [] houses of worship.” Public Statement of Israel Weinstock, *supra*.

Congressional District 19

Proposed Congressional District 19 maintains much of the core of the 2012 district as possible, Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5), while moving westward, necessarily, to absorb a portion of former 2012 Congressional District 22, as a result of New York losing a congressional district. Nevertheless, changes to Proposed CD19 from the 2012 district are relatively limited, maintaining portions of Schoharie County and Otsego County in this district.

⁹ All available at <https://www.youtube.com/watch?v=7HgDIwfiMmw>.

¹⁰ All available at https://nyirc.gov/storage/archive/Mid-Hudson_Capital_Region_Redacted.pdf.

¹¹ Available at <https://www.youtube.com/watch?v=7HgDIwfiMmw>.

Congressional District 20

Proposed Congressional District 20 maintains 100% of the core of the 2012 Congressional District 20, Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5), keeping Albany County whole, Schenectady County whole, and including necessary and related portions of Saratoga, Rensselaer, and Montgomery Counties. Keeping all of Albany and Schenectady Counties, and portions of Saratoga, Rensselaer, and Montgomery Counties in this district also reflects the views of constituents, who urged that these related communities be in one district. Public Testimony of Brendan Cushing, 1:02:42–1:05:57, Virtual Public Meeting of the NYSIRC, Aug. 2, 2021.¹²

Congressional District 21

Proposed Congressional District 21 maintains 100% of the core of the 2012 district, covering the north country and the Adirondacks, with the only changes necessary to maintain equal population. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Proposed CD21 maintains the City of Glen Falls, Town of Queensbury, and Fort Jefferson communities in this district, consistent with the 2012 map.

Congressional District 22

Proposed Congressional District 22 is most analogous to the district presently represented by Congressman Chris Jacobs, so Congressional District 27 in the 2012 map. Proposed CD22 encompasses the whole counties of Wayne, Ontario (with only a small portion of the southeast corner removed for population purposes), Livingston, Wyoming, Genesee, and Orleans Counties, and most of Niagara and Erie Counties with only Niagara Falls and Buffalo removed into their own district. *See infra* p.14. Proposed CD22 is compact, extending only from Lewiston in Niagara County to Wolcott, the easternmost town in Wayne County, for a driving distance of only roughly

¹² Available at <https://www.youtube.com/watch?v=7HgDIwfiMmw>.

120 miles, making this region better for its Representative to travel across the district and perform all necessary duties. N.Y. Const. art. III, § 5.

Congressional District 23

Proposed Congressional District 23 maintains almost all of the core of 2012 Congressional District 23, creating a similar “southern tier” district. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Proposed CD23 encompasses the whole counties of Chautauqua, Cattaraugus, Allegany, Steuben, Yates, Schuyler, Seneca, Chemung, Tompkins, Tioga, and Cortland, and roughly half of Broome County, only as necessary for population-equality purposes. Proposed CD23 includes all of Tompkins County, connecting it with the related communities in Cortland County and the surrounding area. Public Statement of Catherine Wagner; Public Statement of Joseph Sempolinski.¹³

Congressional District 24

Proposed Congressional District 24 also maintains a large majority of the core of 2012 Congressional District 24, encompassing Onondaga County, and much of Oneida and Cayuga Counties. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). Indeed, the only meaningful difference in Proposed CD24 from the 2012 congressional map is the addition of more of Oneida County, which is necessary in order to subsume portions of 2012 Congressional District 22, which no longer exists after New York’s loss of one congressional district, and the removal of Wayne County to compensate for that added population. Otherwise, this Proposed CD24 is largely consistent with the prior district. N.Y. Const. art. III, § 4(c)(5).

¹³ All available at https://nyirc.gov/storage/archive/West_FL_CNY_ST_Redacted.pdf.

Congressional District 25

Proposed Congressional District 25 maintains 100% of the core of 2012 Congressional District 25, in a very compact, Rochester-based district. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5). In addition to all of Monroe County, Proposed CD25 includes only all of the Town of Victor, a small town in Ontario County, but which is a related, commuting suburb of Rochester.

Congressional District 26

Proposed Congressional District 26 maintains 100% of the core of 2012 Congressional District 26, creating a compact district centered on Buffalo and Niagara falls, two related communities of interest. Trende.Rem.Rep.5; N.Y. Const. art. III, § 4(c)(5).

CONCLUSION

For the reasons set forth above, Petitioners respectfully request that the Special Master and this Court adopt Petitioners' Proposed Remedial Congressional Map.

Dated: New York, New York

April 22, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

By: 

Bennet J. Moskowitz, Reg. No. 4693842
875 Third Avenue
New York, New York 10022
(212) 704-6000
bennet.moskowitz@troutman.com

Misha Tseytlin, Reg. No. 4642609
227 W. Monroe St.
Suite 3900
Chicago, IL 60606
(608) 999-1240
misha.tseytlin@troutman.com

Respectfully submitted,

KEYSER MALONEY &
WINNER LLP

By: s/ George H. Winner, Jr.

George H. Winner, Jr., Reg. No. 1539238
150 Lake Street
Elmira, New York 14901
(607) 734-0990
gwinner@kmw-law.com

HOWARD HINMAN &
KATTELL LLP

Richard C. Lewis
700 Security Mutual Building
80 Exchange Street
Binghamton, NY 13901
(607) 231-6605
rlewis@hbk.com

CERTIFICATION

I hereby certify that the foregoing memorandum complies with the bookmarking requirement and word count limitations set forth in Rule 202.8-b of the Uniform Rules of Supreme and County Courts. *See* 22 NYCRR § 202.8-b. This memorandum contains 3,575 words, excluding parts of the document exempted by Rule 202.8-b(b).

Dated: New York, New York
April 22, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

By: /s/ Bennet J. Moskowitz

Bennet J. Moskowitz, Reg. No. 4693842
875 Third Avenue
New York, New York 10022
(212) 704-6000
bennet.moskowitz@troutman.com