

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF STEUBEN**

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**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

**AFFIDAVIT OF CLAUDE A.
LAVIGNA IN SUPPORT OF
EXPERT REPORTS**

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.

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CLAUDE A. LAVIGNA, being duly sworn, says under penalty of perjury as follows:

1. I have been retained by Troutman Pepper Hamilton Sanders LLP on behalf of their clients, Petitioners in the above-titled action, to evaluate the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul.

2. I make this affidavit based on my personal knowledge, and if called upon to testify, I could and would testify to the following facts.

3. I have rendered opinions relating to the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul in the Expert Report of Claude A. LaVigna (“LaVigna Report”).

4. I have rendered opinions relating to Findings Sections C (Partisan Bias) and E (Communities of Interest) of the Expert Report of Stephen Ansolabehere in the Rebuttal Expert Report of Claude A. LaVigna (“LaVigna Rebuttal”).

5. I have confirmed the conclusions in the LaVigna Report in the LaVigna Rebuttal.

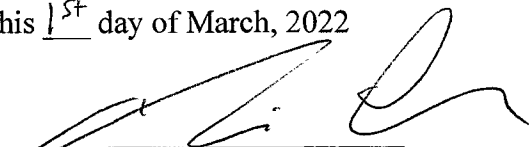
6. This affidavit serves to incorporate by reference the LaVigna Report and the LaVigna Rebuttal, both of which represent my true and accurate beliefs and conclusions on the matters contained therein.

7. If asked to testify on these matters, I could and would testify under oath to their contents, under penalty of perjury.



CLAUDE A. LAVIGNA

Sworn before me
on this 1st day of March, 2022



NOTARY PUBLIC

