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By E-Filing (cervas@cmu.edu)

Jonathan Cervas, Ph.D., Special Master
Carnegie Mellon University
5000 Forbes Avenue
Pittsburgh, PA 15213

Re: *Harkenrider et al. v. Hochul et al.*, Index No. E2022-0116CV

Dear Special Master Cervas:

We represent Senate Majority Leader Andrea Stewart-Cousins in this special proceeding.

At the top of the submission made by Common Cause, Docket No. 383, they provided a link to their proposed Senate plan on the website Dave's Redistricting, which showed a total population deviation of 11%. After I cited that statistic at the hearing today based on the link that Common Cause provided, I was informed by Common Cause that the shapefile they transmitted is for a different plan with a lower total population deviation. We have reviewed the shapefile, and we write to confirm that the total population deviation in that plan is 3.78%. Our remaining statements regarding the Common Cause Senate plan – specifically, to the towns that it splits and block-on-border violations – are accurate with respect to both the Dave's Redistricting plan and shapefile plan.

Thank you for considering this submission.

Respectfully submitted,



Alexander Goldenberg

cc: All Counsel of Record