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By E-Filing

Hon. Patrick F. McAllister
 Supreme Court, Steuben County
 3 East Putney Square
 Bath, New York 14810

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

Dear Justice McAllister:

With respect to Congressional Districts, I thought it would be helpful as the sand runs out of the hourglass to submit to the Court a chart comparing the map of Dr. Cervas as Special Master and the two complete maps of which I am aware that were submitted to you in response to the Special Master's map. In addition to DRA numbers, the Planscore utility (also available via the DRA), calculates the Efficiency Gap and Declination, as well as pursuant to its own complex metrics, that Dr. Cervas can explain to you far better than I, the expected number of seats each party as an expectation could be expected to win. This number is calculated by summing for all 26 seats the percentage chance each party would have to win the seat. The numbers on the chart speak for themselves. I have previously opined that about an 18D-8R split is appropriate, with as generous a number of competitive seats that is otherwise practicable.

	Respondent's Remedial Map	Cervas SM Map	Dunn SM Resp 5-17-22 Doc 596	Petitioner's SM Resp Doc 645
Minority	81	82	82	80
Competitive	24	35	31	39
Proportional	61	85	83	100
Splitting	19	40	33	43
Compactness	42	60	61	62
Gerry Index Trende		0.118		0.094
Eff Gap Planscore	3.5%D	0.9%D	0.5%R%	3.9%R
Declination Planscare	.13D	.00D	.05R	.15R
Proj D Seats Planscore	19.80	19.12	18.60	14.01
Proj R Seats Planscore	6.20	6.88	7.40	11.99

Both the Dr. Cervas and Dunn maps (they both have the same design as to NY-17), may require as a matter of law a slight modification to provide a bridge link across the Hudson River that does not stray out of NY-17. I have previously drawn that issue to Dr. Cervas' attention.

In addition, for the benefit of the Public Square, I provide the DRA links for all four maps. The DRA link was not provided in the letters submitted to you by the attorneys for the Petitioners and Respondents to copy and paste, and I found it necessary to secure the links from elsewhere.

Repondent's Remedial Map:

<https://davesredistricting.org/join/e7b839d4-0ad0-4d72-b8de-9d43e4b790c2>

Special Master's Map:

<https://davesredistricting.org/maps#viewmap::22a818db-e3bd-4246-95eb-381c48802da1>

Dunn's Response to Special Master's Map:

<https://davesredistricting.org/join/899a90fa-ef84-4ac8-b8a5-d28026836017>

Petitioner's Response to Special Master's Map:

<https://davesredistricting.org/join/edb53797-1a26-432b-ae13-2980e4a88709>

Thank you. Let justice be done, including in particular, one way or another, finally giving South Brooklyn a seat of its own – at last.

Sincerely,

/s/

Stephen W. Dunn

cc: Dr. Jonathan Cervas