

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

JEFFERSON COUNTY COMMISSION;
PATRICIA NOLAND, *as an individual
and behalf of all others similarly situated*;
and DALE MANUEL, *as an individual and
behalf of all others similarly situated*,

Plaintiffs, and

THORNTON COOPER,

Intervening Plaintiff,

v.

Civil Action No. 2:11-CV-989
(KING, BAILEY, BERGER)

NATALIE E. TENNANT, *in her capacity as
the Secretary of State*; EARL RAY TOMBLIN,
*in his capacity as the Chief Executive Officer
of the State of West Virginia*; JEFFREY
KESSLER, *in his capacity as the Acting
President of the Senate of the West Virginia
Legislature*; and RICHARD THOMPSON, *in
his capacity as the Speaker of the House of
Delegates of the West Virginia Legislature*,

Defendants.

NOTICE.

Thornton Cooper, Intervening Plaintiff, *pro se*, hereby notifies the Court and the Counsel for the other parties of (a) the specifics of a fourth congressional redistricting plan that he has developed and (b) the information that he plans to use in computing

the areas of the respective congressional districts as he calculates their Reock compactness scores.

Mr. Cooper is of the opinion that providing this information ten (10) days prior to the evidentiary hearing scheduled for December 27, 2011, in the above-captioned case will be of assistance to the Court and will also assist the other Counsel in preparing for that hearing and in arriving at a joint stipulation.

The specifics of Mr. Cooper's fourth congressional redistricting plan, which splits exactly one county, are set forth in Attachment A to this notice. That attachment includes population figures and a maps (created on the Dave's Redistricting website) relating to each congressional district under that plan, as well as population figures and maps from the United States Census Bureau with respect to the county (Taylor County) that would be split under this plan.

The areas of the various counties, from page 1060 of the 2007 edition of the **West Virginia Blue Book**, are set forth in Attachment B to this notice.

THORNTON COOPER

Intervening Plaintiff

Pro Se

/s/ Thornton Cooper
Thornton Cooper (WVSB No. 823)
3015 Ridgeview Drive
South Charleston, WV 25303
(304) 744-9616 (home)
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Dated: December 17, 2011

West Virginia Congressional Redistricting Plan: Cooper Plan No. 4:**CONGRESSIONAL DISTRICT 1:**

Berkeley	104,169
Brooke	24,069
Grant	11,937
Hampshire	23,964
Hancock	30,676
Hardy	14,025
Jefferson	53,498
Marion	56,418
Marshall	33,107
Mineral	28,212
Monongalia	96,189
Morgan	17,541
Ohio	44,443
Pleasants	7,605
Preston	33,520

ATTACHMENT A
To Intervening Plaintiff Thornton
Cooper' Notice in
Civil Action No. 2:11-CV-989

Taylor County Voting District 3	1,108
Taylor County Voting District 9	538
Taylor County Voting District 10	1,411
Taylor County Voting District 11	266
Taylor County Voting District 12	956
Taylor County Voting District 14	1,079
(Subtotal for part of Taylor County)	5,358

Taylor (part)	5,358
Tucker	7,141
Tyler	9,208
Wetzel	16,583
Total	617,663

CONGRESSIONAL DISTRICT 2:

Boone	24,629
Cabell	96,319
Clay	9,386
Jackson	29,211
Kanawha	193,063
Lincoln	21,720
Mason	27,324
Putnam	55,486
Ritchie	10,449
Roane	14,926
Wayne	42,481
Wirt	5,717
Wood	86,956

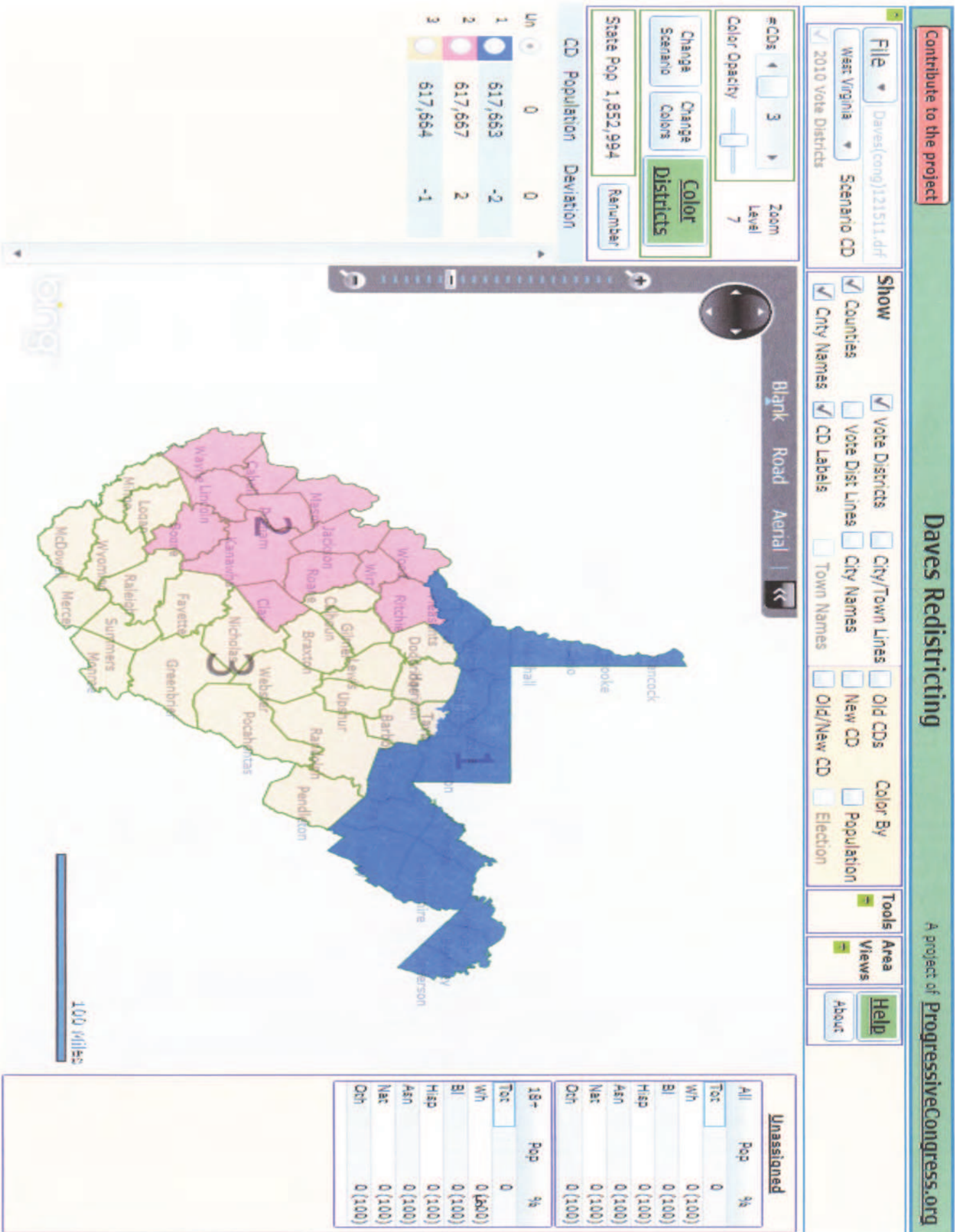
Total	617,667
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CONGRESSIONAL DISTRICT 3:

Barbour	16,589
Braxton	14,523
Calhoun	7,627
Doddridge	8,202
Fayette	46,039
Gilmer	8,693
Greenbrier	35,480
Harrison	69,099
Lewis	16,372
Logan	36,743
McDowell	22,113
Mercer	62,264
Mingo	26,839
Monroe	13,502
Nicholas	26,233
Pendleton	7,695
Pocahontas	8,719
Raleigh	78,859
Randolph	29,405
Summers	13,927

Taylor County Voting District 1	2,214
Taylor County Voting District 2	1,202
Taylor County Voting District 4	968
Taylor County Voting District 6	427
Taylor County Voting District 17	1,084
Taylor County Voting District 19	1,201
Taylor County Voting District 23	570
Taylor County Voting District 25	726
Taylor County Voting District 26	502
Taylor County Voting District 29	314
Taylor County Voting District 31	1,051
Taylor County Voting District 36	1,278
(Subtotal for part of Taylor County)	11,537

Taylor (part)	11,537
Upshur	24,254
Webster	9,154
Wyoming	23,796
Total	617,664



Contribute to the project

Daves Redistricting

A project of ProgressiveCongress.org

File

West Virginia

Scenario CD

2010 Vote Districts

Show

☒ Counties
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 ☐ Old CDs
 ☐ Color By

☒ Vote Districts
 ☐ City Names
 ☐ New CD
 ☐ Population

☒ Cnty Names
 ☒ CD Labels
 ☐ Town Names
 ☐ Old/New CD
 ☐ Election

Tools

Area

Views

Help

About

#CDs

3

Zoom Level

11

Color Opacity

Change Scenario

Change Colors

Color Districts

State Pop 1,852,994

Renumber

CD Population

Deviation

Un	0	0
1	617,663	-2
2	617,667	2
3	617,664	-1

Blank

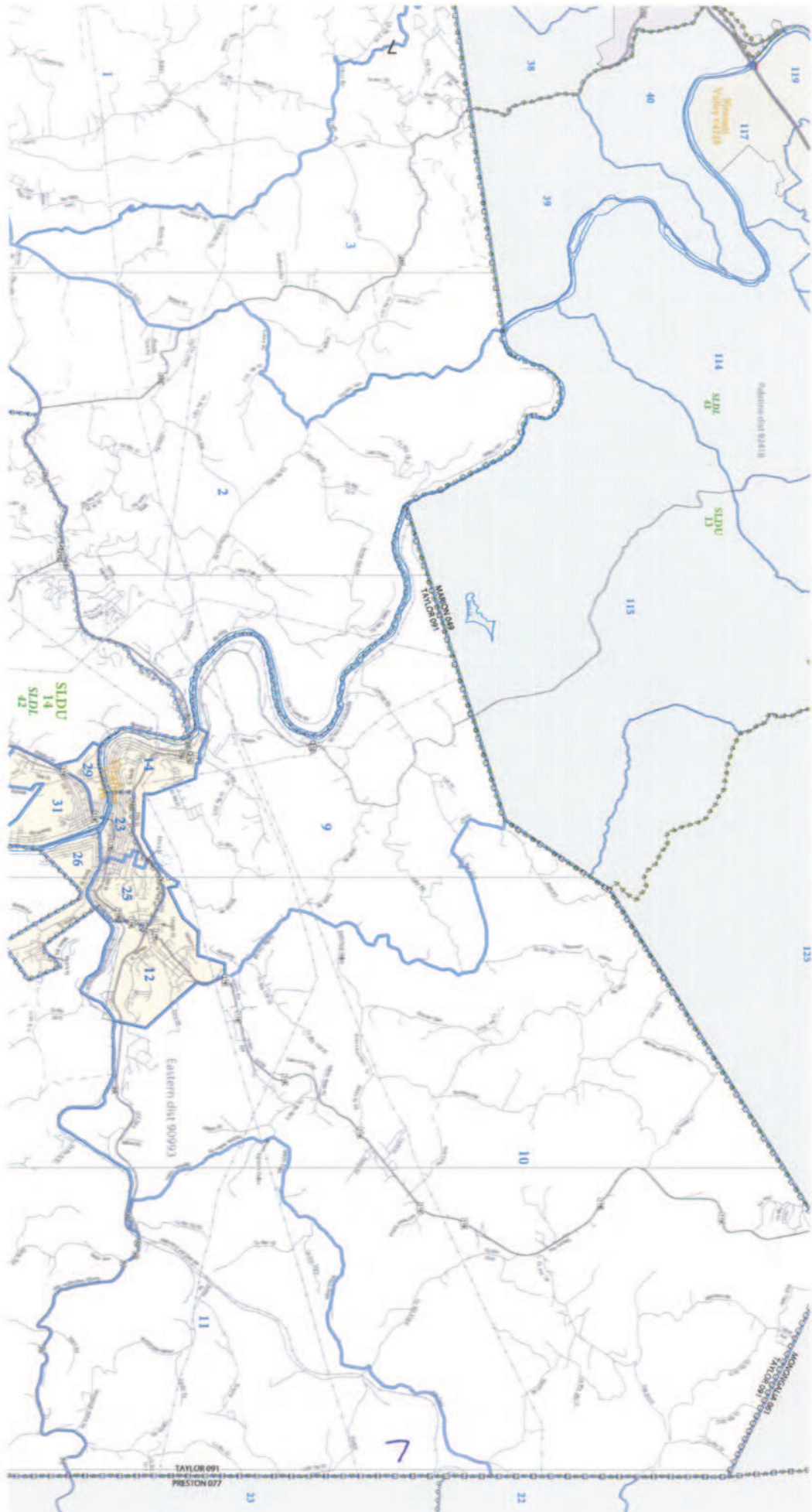
Road

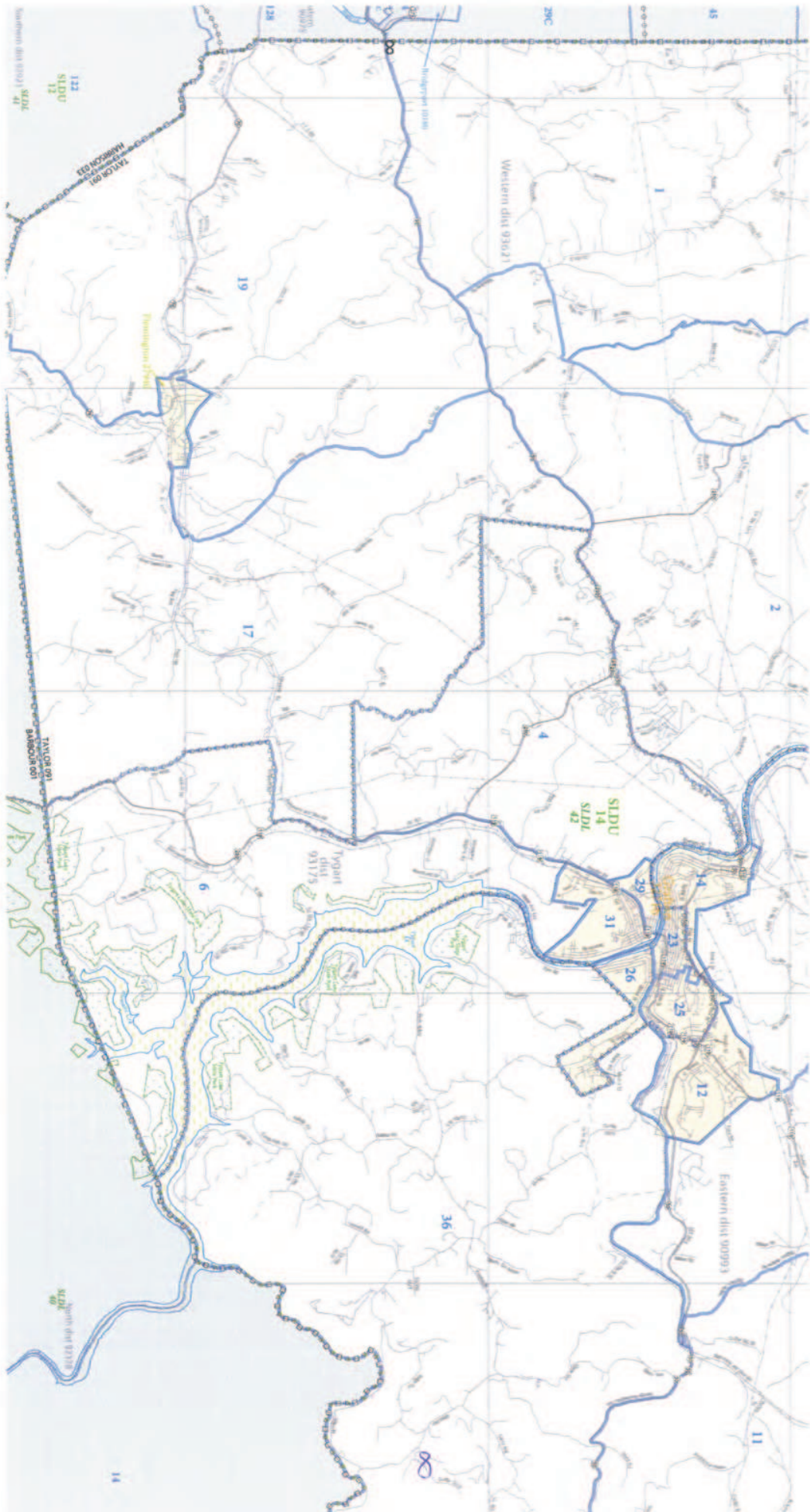
Aerial

Unsigned

All	Pop	%
Tot	0	
Wh	0 (100)	
Bl	0 (100)	
Hisp	0 (100)	
Asn	0 (100)	
Nac	0 (100)	
Oct	0 (100)	

18+	Pop	%
Tot	0	
Wh	0 (100)	
Bl	0 (100)	
Hisp	0 (100)	
Asn	0 (100)	
Nac	0 (100)	
Oct	0 (100)	





ATTACHMENT B
To Intervening Plaintiff Thornton
Cooper' Notice in
Civil Action No. 2-11-CV-989

1060

WEST VIRGINIA BLUE BOOK

	Feet
Ripley	616
Romney	800
Sago	1,463
Saint Albans	598
Saint Marys	620
Sand Fork	745
Shepherdstown	405
Sistersville	640
Smithburg	797
South Charleston	700
Spencer	749
Summersville	1,920
Sutton	940
Terra Alta	2,559
Thomas	3,100
Union	2,071

	Feet
War	1,355
Wardensville	1,011
Wayne	708
Webster Springs	1,480
Weirton	660
Welch	1,306
Wellsburg	660
West Hamlin	590
Weston	1,023
Westover	820
West Union	785
Wheeling	673
White Sulphur Springs	1,980
Whitesville	840
Williamson	720
Williamstown	620
Winfield	589

AREA OF WEST VIRGINIA BY COUNTIES*

(Compiled from data furnished by West Virginia Geological and Economic Survey)

County	Square Miles
Barbour	342.9
Berkeley	321.8
Boone	503.2
Braxton	516.7
Brooke	92.8
Cabell	288.1
Calhoun	280.4
Clay	346.4
Doddridge	320.6
Fayette	668.7
Gilmer	339.7
Grant	480.3
Greenbrier	1,024.8
Hampshire	644.5
Hancock	88.2
Hardy	584.6
Harrison	416.6
Jackson	471.2
Jefferson	211.6
Kanawha	908.4
Lewis	389.5
Lincoln	439.0
Logan	455.6
McDowell	535.0
Marion	311.6
Marshall	311.8
Mason	445.2
Mercer	420.8
Mineral	329.3

County	Square Miles
Mingo	423.9
Monongalia	365.8
Monroe	473.5
Morgan	229.6
Nicholas	654.1
Ohio	108.9
Pendleton	698.1
Pleasants	134.6
Pocahontas	941.6
Preston	651.4
Putnam	350.3
Raleigh	608.9
Randolph	1,040.0
Ritchie	453.7
Roane	484.0
Summers	367.6
Taylor	175.6
Tucker	421.0
Tyler	260.7
Upshur	354.7
Wayne	512.3
Webster	556.2
Wetzel	361.3
Wirt	235.1
Wood	377.0
Wyoming	501.9
TOTAL AREA	24,231.4

*Includes water area.

GEOGRA

The geographical center of
County, 4 1/4 miles southeast of
dinates for the center are: 80

SOURCES

(Compiled from data

Formed by the junction of
with Ohio at Kenova, Wayne

Formed by the junction of
River at Point Marion, Penn

Formed by the junction of
ty. Mouth, junction with Ka

Formed in western part
Fork. Mouth, junction with

Formed in western part
Mouth, junction with New

Formed in northern part
junction with New River at

Formed in southern part
Mouth, junction with Ohio

Formed by the junction
Mouth, junction with Ohio

Source in southern part
County.

Formed by the junction
the Allegheny River at Pi

Source in southern part
with Gauley River in Fay

Formed by the junction
Mouth, junction with Mi

Source in the southeast
County.

Formed by the junction
Mouth, Chesapeake Bay.

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FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
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JEFFERSON COUNTY COMMISSION;
PATRICIA NOLAND, *as an individual
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President of the Senate of the West Virginia
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his capacity as the Speaker of the House of
Delegates of the West Virginia Legislature*,

Defendants.

CERTIFICATE OF SERVICE.

I, Thornton Cooper, Intervening Plaintiff, do hereby certify that on December 17, 2011, I electronically filed the foregoing **NOTICE** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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