

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAWN CURRY PAGE, et al.,)	
)	
Plaintiffs,)	Civil Action No. 3:13-cv-678
)	
v.)	
)	
VIRGINIA STATE BOARD OF ELECTIONS, et al.,)	
)	
Defendants.)	
)	
)	
)	

**PLAINTIFFS' NOTICE OF FILING OF ALTERNATIVE CONGRESSIONAL
REDISTRICTING PLAN**

Pursuant to the Court's directive during the scheduling conference on January 28, 2014, Plaintiffs hereby submit their Alternative Congressional Redistricting Plan (the "Alternative Plan"). Plaintiffs are submitting this Plan as their proposed alternative to Virginia's enacted Congressional redistricting plan (the "Enacted Plan") that is the subject of Plaintiffs' claims.

As demonstrated in the accompanying exhibits, the Alternative Plan changes only two congressional districts ("CD") in the Enacted Plan – CD 2 and CD 3. The Alternative Plan remedies the unlawful racial gerrymander in CD 3 by eliminating the splits in the Enacted Plan in Hampton, Newport News, Norfolk, and Portsmouth. Eliminating these splits moves 132,745 people from CD 3 into CD 2 and moves the same number of people from CD 2 into CD 3. In all other respects, the Alternative Plan is the same as the Enacted Plan.

The exhibits provided with this Notice include a map of the entire Alternative Plan (Exhibit A), a map showing just Alternative CDs 2 and 3 (Exhibit B), and a map that focuses on just Alternative CD 3 (Exhibit C). In addition, Plaintiffs are providing a statistical table showing the racial composition of each of the congressional districts in the Alternative Plan (Exhibit D),

reported as both total population and voting age population. As reflected in the table, CDs 2 and 3 are the only districts in the Alternative Plan that have a change in racial composition from the Enacted Plan.

Dated: February 4, 2014

Respectfully submitted,

By _____/s/_____
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EXHIBIT A

Page Plaintiffs' Alternative Congressional Redistricting Plan

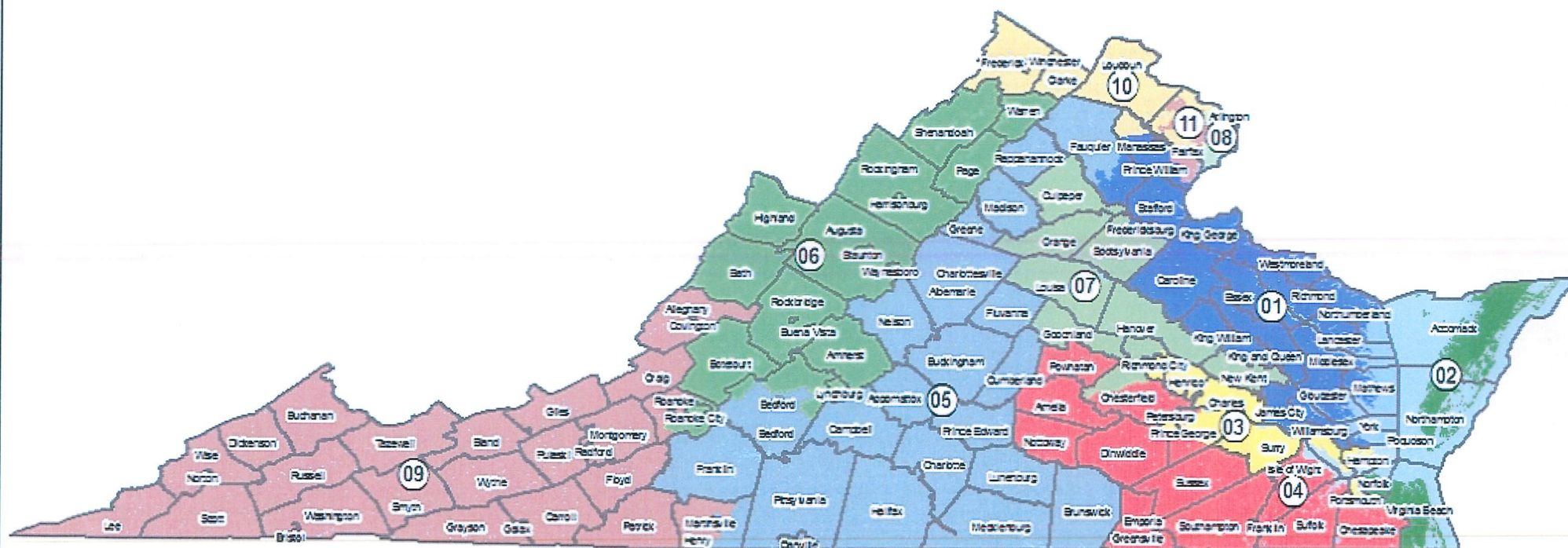


EXHIBIT B

Page Plaintiffs' Alternative Congressional Redistricting Plan

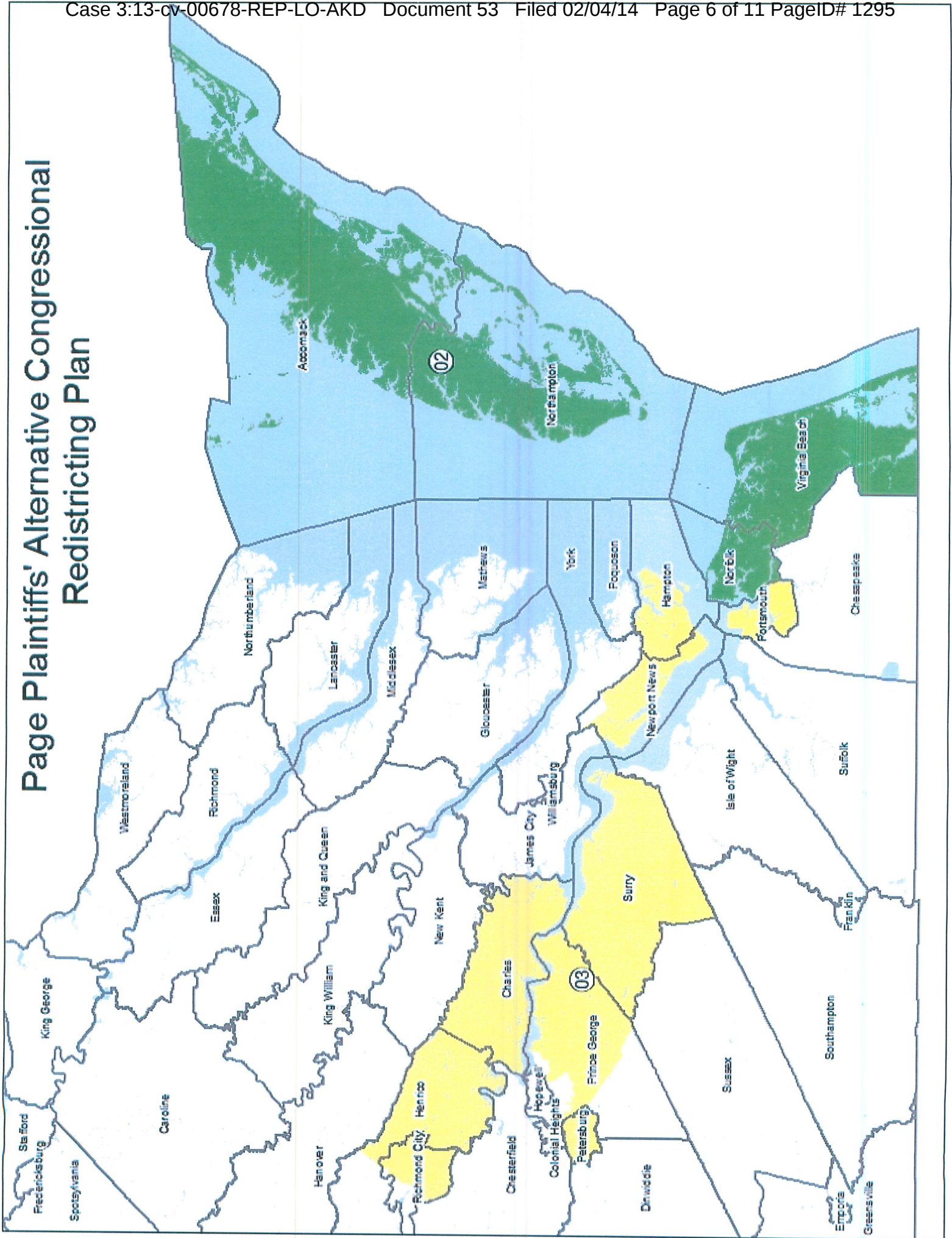


EXHIBIT C

Page Plaintiffs' Alternative Congressional Redistricting Plan

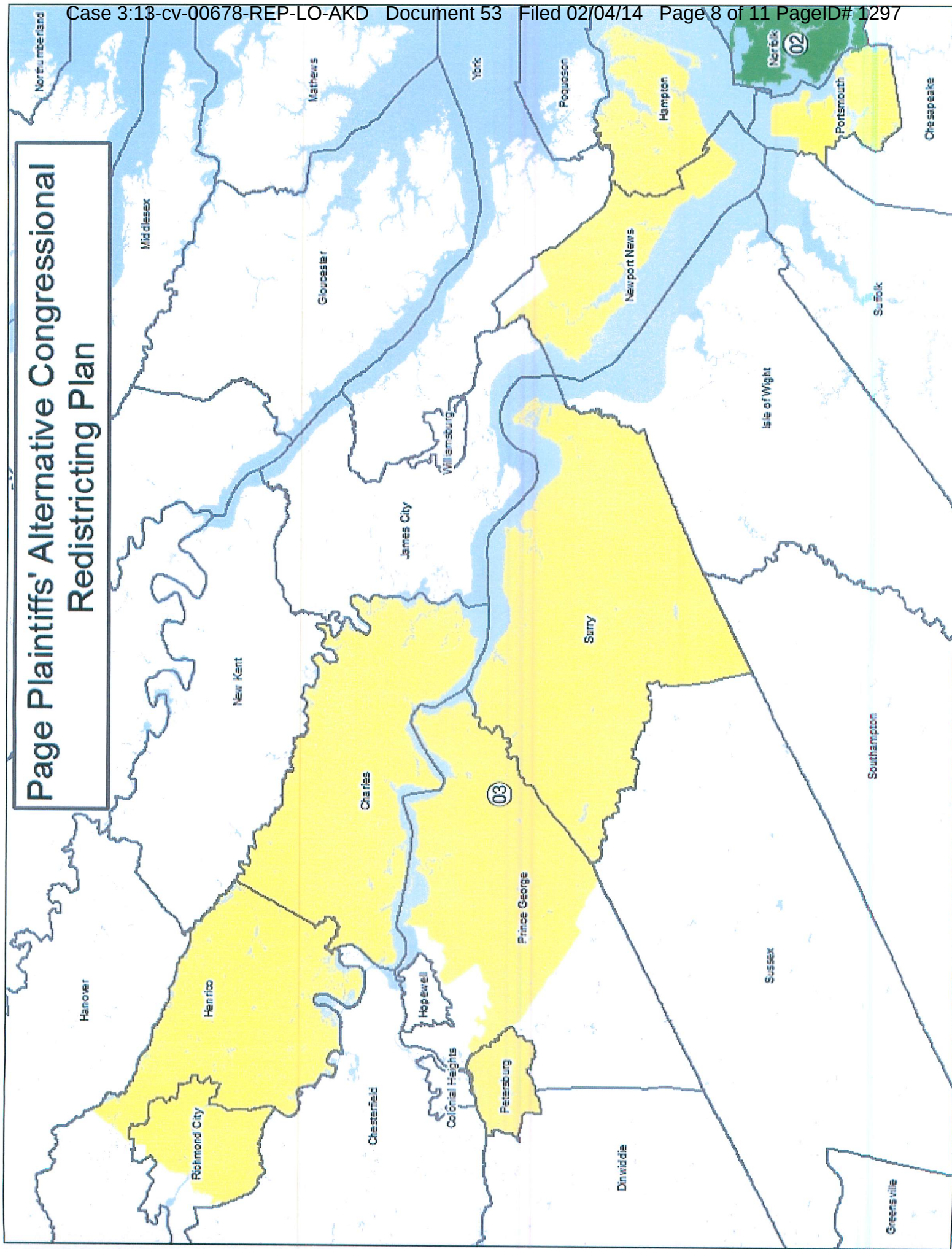


EXHIBIT D

Page Plaintiff's Alternative Congressional Redistricting Plan**Population Summary Data**

CD	Total Population	Deviation	Black alone or in Combination	Black alone or in Combination (Age 18+)	Hispanic Origin	Hispanic Origin (Age 18+)	Asian alone or in Combination	Asian alone or in Combination (Age 18+)
1	727366	0	18.5%	17.3%	8.4%	7.2%	4.4%	4.0%
2	727366	0	30.1%	27.8%	6.7%	5.9%	6.2%	5.9%
3	727366	0	54.3%	51.0%	5.3%	4.6%	2.7%	2.8%
4	727366	0	33.0%	31.7%	4.7%	4.0%	2.7%	2.5%
5	727365	-1	21.5%	20.5%	3.2%	2.6%	1.9%	1.8%
6	727366	0	11.9%	10.7%	4.3%	3.5%	1.8%	1.6%
7	727366	0	15.7%	14.9%	5.1%	4.3%	4.8%	4.4%
8	727366	0	15.1%	14.1%	18.6%	17.0%	12.8%	12.4%
9	727366	0	5.6%	5.2%	1.9%	1.6%	1.4%	1.4%
10	727365	-1	7.9%	7.3%	11.7%	10.6%	13.7%	12.9%
11	727366	0	13.9%	12.7%	17.0%	15.5%	19.4%	18.8%

The Alternative Congressional Redistricting Plan only makes changes to four Localities (Hampton, Newport News, Norfolk, and Portsmouth) and impacts just two Congressional Districts by switching 132,745 persons between district 2 and district 3.

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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