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By E-Filing and E-Mail (cervas@cmu.edu)Jonathan Cervas, Ph.D., Special Master
Carnegie Mellon University
5000 Forbes Avenue
Pittsburgh, PA 15213Re: *Harkenrider et al. v. Hochul et al.*, Index No. E2022-0116CV

Dear Special Master Cervas:

We represent Senate Majority Leader Andrea Stewart-Cousins. We write to respond briefly to the letter filed this morning by Stephen Dunn.

Mr. Dunn states incorrectly that the Legislature did not provide necessary information regarding its proposed congressional map. Immediately after publicly filing the Legislature's proposed map, we sent you and counsel for all parties the block equivalency data and shapefile for the plan. We also promptly sent the same information to the CUNY Mapping Service, a non-partisan academic initiative that has provided information to the public about redistricting maps in New York throughout this redistricting cycle. The CUNY Mapping Service has posted the Legislature's proposed plan on its website, "Redistricting & You," together with a public link to the block equivalency data and shapefile.

Mr. Dunn also comments on the expert report of Dr. Michael Barber submitted with the Legislature's proposed map. Dr. Barber addressed criteria that map-drawers are required to consider, including population equality, compactness, core retention, and fairness to racial and language minority groups. There are a variety of metrics to assess partisan lean and partisan fairness, and the data made publicly available by the Legislature can be used to conduct such analyses.

Respectfully submitted,



Alexander Goldenberg

cc: All Counsel of Record