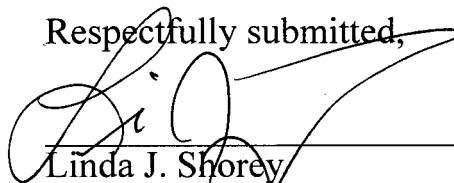


Tab L (docket sheet) of the Appendix to Statement of Material Facts. While on March 22, 2002, Plaintiffs discussed "whether to call [the Armstrong County situation] to [this] court's attention," they did not do so until one month later – April 22, 2002 – after this Court had issued its April 8, 2002 order declaring the Act 1 plan unconstitutional and the General Assembly had enacted a new plan. *See* Plaintiffs' Application and attached table. If Plaintiffs had been upfront with this Court, and with Defendants, the whole Armstrong County issue could have been dealt with by the General Assembly before Act 34 was enacted.

Plaintiffs failure to disclose this crucial information has resulted in this case dragging on far past the time when it should have concluded, wasting the resources not only of this Court but also of the General Assembly.

January 3, 2003

Respectfully submitted,



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TABLE OF TIME ENTRIES FROM PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEES & COSTS CONCERNING ARMSTRONG COUNTY

| DATE & LAW FIRM | TIME-KEEPER | TIME | DESCRIPTION |
|----------------------------------|--------------------|-------------|---|
| 3/22/02 (Jenner & Block ("J&B")) | BVS | 1.50hrs | Worked on Armstrong County issue; telephone conference with Lou Lignelli; telephone conference with B.Hoffman; telephone conference with B.Priest |
| 3/22/02 (J&B) | SH | 0.50hrs | Engaged in e-mail exchange with team members re Armstrong County precinct and whether to call it to court's attention |
| 3/25/02 (J&B) | BVS | 0.25hrs | Worked on obtaining Armstrong County Opinion; reviewed emails from Bob Priest and others re Act 1 map |
| 3/26/02 (J&B) | BVS | 1.00hrs | Telephone conference with B.Hoffman re Armstrong County decision and potential federal court decision; reviewed Armstrong County petition; telephone conference with B.Priest re various issues |
| 3/26/02 (J&B) | SH | 0.25hrs | Read materials on Armstrong County precinct and set e-mail to B.Spiva and D.Mach |
| 3/27/02 (J&B) | BVS | 1.50hrs | Worked on Armstrong County issue; telephone conference with B.Priest re same; discussed Armstrong County issue with T.Perrelli |
| 3/28/02 (J&B) | BVS | 0.75hrs | Worked on Armstrong County issue |
| 4/01/02 (J&B) | BVS | 0.25hrs | Discussed Armstrong County issue with S.Hirsch and T.Perrelli |
| 4/02/02 (J&B) | BVS | 0.25hrs | Discussed Armstrong County issue with T.Perrelli |
| 4/02/02 (J&B) | TP | 1.00hrs | Reviewed allegations re Armstrong County precinct splits; conferred with B.Spiva and S.Casper re same |
| 4/03/02 (J&B) | BVS | 1.00hrs | Telephone conference with B.Priest and S.Casper re Armstrong County issue; worked on notice to court re same |
| 4/04/02 (J&B) | BVS | 3.75hrs | Drafted notice to court re Armstrong County precinct realignment; met with with [sic] S.Hirsch re same; revised same |
| 4/15/02 (J&B) | TP | 0.75hrs | Reviewed and edited opposition for stay motion; phone calls with B.Priest re Armstrong County issues |

| | | | |
|-----------------------------|--------|---------|---|
| 4/16/02 (J&B) | BVS | 2.00 | Telephone call with Paul Smith re case; reviewed stay opposition; met with B.Hauck re opposition to new map and Armstrong County issue; telephone conference with Bob Priest re new map passed by General Assembly |
| 3/25/02 (Reed Smith ("RS")) | Martin | 1.50hrs | Message from R.Hoffman; review fax; telephone call to Judge Nickleach in Armstrong County regarding Opinion received regarding voting precincts; e-mail to B.Spiva; telephone call to S.Davis, Armstrong County; request Copy of Petition; meeting with R.Hoffman |
| 3/26/02 (RS) | Martin | 1.00hrs | Telephone call to Prothonotary of Armstrong County regarding Petition and Order; telephone call from B.Spiva regarding federal case; telephone call to Federal Court; telephone call to B.Spiva; fax documents |
| 3/28/02 (RS) | Martin | 0.75hrs | Request check for documents from Armstrong County; conference with B.Kaiser regarding Judge Nichleach's order |
| 3/28/02 (RS) | Kaiser | 1.70hrs | File organization; telephone calls to Armstrong County prothonotary to obtain copy of order; telephone call to title searcher re: same |
| 4/19/02 (RS) | Martin | 0.50hrs | Contact Armstrong County Prothonotary regarding Docket No. 2002-0081-Misc.; e-mail to B.Hauck regarding same |

CERTIFICATE OF SERVICE

I certify that on January 3, 2003, I caused a copy of the foregoing Supplemental Memo in Support of Summary Judgment to be served on the following in the manner indicated:

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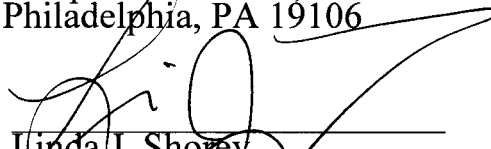
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