

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF STEUBEN**

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**TIM HARKENRIDER, GUY C. BROUGHT,  
LAWRENCE CANNING, PATRICIA CLARINO,  
GEORGE DOOHER, JR., STEPHEN EVANS, LINDA  
FANTON, JERRY FISHMAN, JAY FRANTZ,  
LAWRENCE GARVEY, ALAN NEPHEW, SUSAN  
ROWLEY, JOSEPHINE THOMAS, and MARIANNE  
VIOLANTE,**

Index No. E2022-0116CV

**AFFIDAVIT OF SEAN P.  
TRENDE IN SUPPORT OF  
EXPERT REPORTS**

**Petitioners,**

**-against-**

**GOVERNOR KATHY HOCHUL, LIEUTENANT  
GOVERNOR AND PRESIDENT OF THE SENATE  
BRIAN A. BENJAMIN, SENATE MAJORITY LEADER  
AND PRESIDENT PRO TEMPORE OF THE SENATE  
ANDREA STEWART-COUSINS, SPEAKER OF THE  
ASSEMBLY CARL HEASTIE, NEW YORK STATE  
BOARD OF ELECTIONS, and THE NEW YORK STATE  
LEGISLATIVE TASK FORCE ON DEMOGRAPHIC  
RESEARCH AND REAPPORTIONMENT,**

**Respondents.**

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**SEAN P. TRENDE, being duly sworn, says under penalty of perjury as follows:**

1. I have been retained by Troutman Pepper Hamilton Sanders LLP on behalf of their clients, Petitioners in the above-titled action, to evaluate the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul.

2. I make this affidavit based on my personal knowledge, and if called upon to testify, I could and would testify to the following facts.

3. I have rendered opinions relating to the 2022 state Senate and Congressional maps, 2021–2022 N.Y. Reg. Sess. Leg. Bills S.8196, A.9039-A, A.9040-A, and A.9168, enacted by the New York State Legislature and signed by Governor Kathy Hochul in the Expert Report of Sean P. Trende (hereinafter “Trende Report”).

4. I have rendered opinions relating to the Affidavit of Dr. Michael Barber, Ph.D., the Affidavit of Dr. Kristopher R. Tapp, Ph.D., and the Expert Report of Stephen Ansolabehere in the Reply of Sean P. Trende (hereinafter “Trende Reply”).

5. I have confirmed the conclusions in the Trende Report in the Trende Reply.

6. This affidavit serves to incorporate by reference the Trende Report and the Trende Reply, both of which represent my true and accurate beliefs and conclusions on the matters contained therein.

7. If asked to testify on these matters, I could and would testify under oath to their contents, under penalty of perjury.

  
SEAN P. TRENDE

Sworn before me  
on this 1 day of March, 2022

  
NOTARY PUBLIC



**TEJA KAYLENE TIBBS**  
Notary Public  
State of Ohio  
My Comm. Expires  
September 29, 2025

**CERTIFICATE OF CONFORMITY PURSUANT TO N.Y. CPLR § 2309(c)**

I, Elizabeth Trende, do hereby certify and attest that I am an attorney duly admitted to practice law in the State of Ohio.

I make this certification for purposes of compliance with New York State Civil Practice Law & Rules Section 2309(c) with regard to the foregoing Affidavit of Sean Trende, to be filed in the Supreme Court in Steuben County, State of New York.

Said Affidavit, acknowledged and sworn by Mr. Trende before a Notary Public in and for the State of Ohio, is and appears to be, based upon my review of said document and notarization thereof, in conformity with the laws of the State of Ohio for the making of an affidavit and the notarization thereof.

Elizabeth Trende

Sworn before me  
on this 1 day of March, 2022

Teja Kaylene Tibbs  
NOTARY PUBLIC



TEJA KAYLENE TIBBS  
Notary Public  
State of Ohio  
My Comm. Expires  
September 29, 2025