

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

WILLIAM WHITFORD, et al.,

Plaintiffs,

Case No. 15-cv-421-bbc

v.

GERALD NICHOL, et al.,

Defendants.

PLAINTIFFS' RULE 26(A)(3) PRETRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Preliminary Pretrial Conference Order entered October 15, 2015 (Dkt. 33), Plaintiffs William Whitford, et al., hereby make the following disclosures:

I. RULE 26(A)(3)(A)(i): IDENTIFICATION OF WITNESSES

A. Witnesses Plaintiffs Expect to Present

Plaintiffs expect to call the following witnesses at trial:

1. Kenneth Mayer, Ph.D.
2. Simon Jackman, Ph.D.
3. William Whitford, J.D.
4. Ronald Keith Gaddie, Ph.D.*
5. Mark Lanterman *
6. Adam Foltz

* Plaintiffs expect to present Professor Gaddie's testimony by video deposition.

* Plaintiffs intend to present Mark Lanterman for live testimony by video from a federal courthouse, and will file a motion asking the Court for leave to present his live testimony by video.

7. Tad Ottman
8. Jeffrey Ylvisaker*
Wisconsin Legislative Technology Services Bureau
17 West Main Street, Suite 200
Madison, WI 53703
(608) 283-1834
9. Joseph Handrick
201 East Washington Street, Suite E300
Madison, WI 53703
(608) 266-0946

B. Witnesses Plaintiffs May Call if the Need Arises

Plaintiffs may call the following witnesses at trial:

1. Any and all witnesses identified by Defendants.
2. Any and all witnesses called by Defendants.
3. Any impeachment and rebuttal witnesses as necessary.
4. Any custodian of records necessary to authenticate documents.

II. RULE 26(A)(3)(A)(ii): DEPOSITION DESIGNATIONS

The affirmative deposition designations of those witnesses whom Plaintiffs expect to call at trial via videotaped deposition are attached as Exhibit 1.

Plaintiffs reserve the right to further designate depositions if a witness listed becomes unavailable.

* Plaintiffs expect to present Mr. Ylvisaker's testimony by video deposition.

III. RULE 26(A)(3)(A)(iii): IDENTIFICATION OF EXHIBITS

Plaintiffs expect to offer or utilize the exhibits and/or documents identified in the accompanying Exhibit 2.

Plaintiffs may offer if the need arises the exhibits and/or documents identified in the accompanying Exhibit 3.

Dated: April 25, 2016

Respectfully submitted,

*/s/ Annabelle Harless
One of the attorneys for plaintiffs*

Peter G. Earle
LAW OFFICE OF PETER G. EARLE
839 North Jefferson Street, Suite 300
Milwaukee, WI 53202
(414) 276-1076
peter@earle-law.com

Michele Odorizzi
MAYER BROWN, LLP
71 South Wacker Drive
Chicago, IL 60606
(312) 782-0600
modorizzi@mayerbrown.com

Gerry Hebert
Ruth Greenwood
Annabelle Harless
Danielle Lang
CAMPAIGN LEGAL CENTER
1411 K Street NW, Suite 1400
Washington, DC 20005
(202) 736-2200
ghebert@campaignlegalcenter.org
rgreenwood@campaignlegalcenter.org
aharless@campaignlegalcenter.org
dlang@campaignlegalcenter.org

Nicholas O. Stephanopoulos
UNIVERSITY OF CHICAGO LAW
SCHOOL
1111 E. 60th St., Suite 510
Chicago, IL 60637
(773) 702-4226
nsteph@uchicago.edu

Douglas M. Poland
RATHJE & WOODWARD, LLC
10 East Doty Street, Suite 800
Madison, WI 53703
(608) 441-5104
dpoland@rathjewoodward.com

Paul Strauss
CHICAGO LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW, INC.
100 N. LaSalle St., Suite 600
Chicago, IL 60602
(312) 202-3649
pstrauss@clccrul.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on April 25, 2016, a true and correct copy of the foregoing was served on all counsel of record via CM/ECF.

Dated: April 25, 2016

By: /s/ Annabelle Harless

One of the attorneys for plaintiffs

EXHIBIT 1

Exhibit 1**Plaintiffs' Deposition Designations**

Plaintiffs reserve the right to amend, supplement, or withdraw their designations at any time before or during trial. Plaintiffs further reserve the right to object to any documents or testimony that Defendants may offer at trial.

Name of Deponent	Date of Deposition	Beginning Page/Line	Ending Page/Line
Ronald Keith Gaddie	January 20, 2012	20:1	20:11
		40:1	45:17
		52:9	54:20
		59:17	60:1
		79:9	79:22
		91:15	91:25
		117:19	118:6
		122:25	123:11
		139:10	139:16
		147:5	148:14
		167:21	183:13
		186:1	192:14
		193:3	194:19
		195:9	206:25
		208:5	208:25
		210:11	210:25
		218:8	219:18
		232:1	232:21
		253:8	259:22
		265:21	267:23
		279:17	280:6
Ronald Keith Gaddie	March 9, 2016	5:1	17:2
		17:12	29:2
		29:5	31:25
		32:7	36:19
		37:3	38:8
		38:20	65:4
		65:24	93:11
		94:13	102:9
		102:13	109:18
		109:20	109:23

		111:1	118:3
		118:6	118:13
		119:8	125:3
		125:13	125:18
		125:25	132:23
		133:2	133:15
		133:22	134:7
		134:9	135:14
		135:22	137:20
		137:22	141:20
		141:23	143:5
		143:8	143:13
		144:14	146:17
		146:21	148:9
		148:24	152:1
		152:14	152:25
		153:2	154:1
		154:10	159:5
		159:13	161:8
		161:16	163:18
		163:23	165:1
		165:6	166:6
		166:12	169:11
		169:19	172:1
		172:5	173:6
		173:10	173:14
		173:16	174:1
		174:6	174:11
		174:15	187:9
		187:12	193:22
		193:24	206:2
		206:11	207:8
		207:11	207:14
		207:21	211:9
		211:13	216:9
		216:11	223:22
		224:3	231:4
		231:14	231:25
		232:2	242:15
		242:21	244:12
		244:15	248:12
Jeffrey Ylvisaker	April 29, 2013	6:1	7:9
		19:8	19:18
		20:17	29:21

		42:6	43:22
		67:17	68:7
		69:3	71:21
		82:1	83:21
		86:18	90:10
		91:19	93:15
		94:15	95:23
		97:23	110:2
		110:11	112:25
		115:21	116:19
		119:9	121:19
		122:9	124:13
		124:24	126:13
		126:24	127:21
		143:6	149:7
		163:16	165:4
		170:4	170:12
		179:15	180:2
		181:5	182:13
		183:3	185:3
		188:5	189:15
Jeffrey Ylvisaker	March 11, 2016	4:1	45:4
		54:19	58:4

EXHIBIT 2

Exhibit 2**Exhibits Plaintiffs Expect to Present at Trial**

Exhibit No.	Description
1	Illustrative Maps
2	Expert Report of Ken Mayer, dated July 3, 2015
3	Expert Report of Ken Mayer, Mayer Regression Model
4	Expert Report of Ken Mayer, Figure 1
5	Expert Report of Ken Mayer, Figure 2
6	Expert Report of Ken Mayer, Figure 3
7	Expert Report of Ken Mayer, Figure 4
8	Expert Report of Ken Mayer, Figure 5
9	Expert Report of Ken Mayer, Figure 6
10	Expert Report of Ken Mayer, Figure 7
11	Expert Report of Ken Mayer, Figure 8
12	Expert Report of Ken Mayer, Figure 9
13	Expert Report of Ken Mayer, Figure 10
14	Expert Report of Ken Mayer, Figure 11
15	Expert Report of Ken Mayer, Figure 12
16	Expert Report of Ken Mayer, Figure 13
17	Expert Report of Ken Mayer, Figure 14
18	Expert Report of Ken Mayer, Table 1
19	Expert Report of Ken Mayer, Table 2
20	Expert Report of Ken Mayer, Table 3
21	Expert Report of Ken Mayer, Table 4
22	Expert Report of Ken Mayer, Table 5
23	Expert Report of Ken Mayer, Table 6
24	Expert Report of Ken Mayer, Table 7
25	Expert Report of Ken Mayer, Table 8
26	Expert Report of Ken Mayer, Table 9
27	Expert Report of Ken Mayer, Table 10
28	Expert Report of Ken Mayer, Annex Table, Differences Between GAB reports and LTSB data
29	Expert Report of Ken Mayer, Annex Table, Allocation of Reporting Unit Data to Ward Data
30	Expert Report of Ken Mayer, Annex Table, Independent Variable: Assembly Republican Vote Totals
31	Expert Report of Ken Mayer, Annex Table, Independent Variable: Assembly Democratic Vote Totals
32	Expert Report of Ken Mayer, Annex Table, Population Deviation
33	Expert Report of Ken Mayer, Annex Table, Compactness
34	Expert Report of Simon Jackman, dated July 7, 2015
35	Expert Report of Simon Jackman, Figure 1
36	Expert Report of Simon Jackman, Figure 2

37	Expert Report of Simon Jackman, Figure 3
38	Expert Report of Simon Jackman, Figure 4
39	Expert Report of Simon Jackman, Figure 5
40	Expert Report of Simon Jackman, Figure 6
41	Expert Report of Simon Jackman, Figure 7
42	Expert Report of Simon Jackman, Figure 8
43	Expert Report of Simon Jackman, Figure 9
44	Expert Report of Simon Jackman, Figure 10
45	Expert Report of Simon Jackman, Figure 11
46	Expert Report of Simon Jackman, Figure 12
47	Expert Report of Simon Jackman, Figure 13
48	Expert Report of Simon Jackman, Figure 14
49	Expert Report of Simon Jackman, Figure 15
50	Expert Report of Simon Jackman, Figure 16
51	Expert Report of Simon Jackman, Figure 17
52	Expert Report of Simon Jackman, Figure 18
53	Expert Report of Simon Jackman, Figure 19
54	Expert Report of Simon Jackman, Figure 20
55	Expert Report of Simon Jackman, Figure 21
56	Expert Report of Simon Jackman, Figure 22
57	Expert Report of Simon Jackman, Figure 23
58	Expert Report of Simon Jackman, Figure 24
59	Expert Report of Simon Jackman, Figure 25
60	Expert Report of Simon Jackman, Figure 26
61	Expert Report of Simon Jackman, Figure 27
62	Expert Report of Simon Jackman, Figure 28
63	Expert Report of Simon Jackman, Figure 29
64	Expert Report of Simon Jackman, Figure 30
65	Expert Report of Simon Jackman, Figure 31
66	Expert Report of Simon Jackman, Figure 32
67	Expert Report of Simon Jackman, Figure 33
68	Expert Report of Simon Jackman, Figure 34
69	Expert Report of Simon Jackman, Figure 35
70	Expert Report of Simon Jackman, Figure 36
71	Expert Report of Simon Jackman, Table 1
72	Secrecy Agreements by Republican Legislators
73	Defendants' Amended Answer, dated January 15, 2016
74	Nicholas Stephanopoulos, Our Electoral Exceptionalism (2013) article
75	Ellen Katz, Documenting Discrimination in Voting-Judicial Findings Under Section 2 (2005) article (Part 1 of 2)
76	Ellen Katz, Documenting Discrimination in Voting- Judicial Findings Under Section 2 (2005) article (Part 2 of 2)
77	Jacob Stein & Patrick Marley, GOP Redistricting Maps Make Dramatic Changes, July 8, 2011
78	Samuel Issacharoff, Gerrymandering and Political Cartels (2002) article

79	Richard Pildes, The Theory of Political Competition (1999) article
80	Jacob Stein and Patrick Marley, More Than They Bargained For (2013) book excerpt, from Chapter "First Assembly Vote"
81	Trende dataset2.csv
82	Curriculum Vitae of Dr. Simon Jackman
83	Expert Rebuttal Report of Simon Jackman, dated December 21, 2015
84	Expert Rebuttal Report of Simon Jackman, Figure 1
85	Expert Rebuttal Report of Simon Jackman, Figure 2
86	Expert Rebuttal Report of Simon Jackman, Figure 3
87	Expert Rebuttal Report of Simon Jackman, Figure 4
88	Expert Rebuttal Report of Simon Jackman, Figure 5
89	Expert Rebuttal Report of Simon Jackman, Figure 6
90	Expert Rebuttal Report of Simon Jackman, Figure 7
91	Expert Rebuttal Report of Simon Jackman, Figure 8
92	Expert Rebuttal Report of Simon Jackman, Figure 9
93	Jackman Sensitivity Testing Reliance Material
94	Jackman Sensitivity Testing Reliance Material, Figure 1
95	Jackman Sensitivity Testing Reliance Material, Figure 2
96	Excerpted Carl Klarner Data
97	Party Control Data
98	Eric McGhee, Measuring Partisan Bias in Single-Member District Electoral Systems (2014) article
99	Fifield et al, A New Automated Redistricting Simulator Using Markov Chain Monte Carlo (2015) article
100	Andrew Gelman and Gary King, Estimating the Electoral Consequences of Legislative Redistricting (1990) article
101	Gary Cox and Jonathan Katz, Elbridge Gerry's Salamander (2002) book excerpt
102	Bruce Cain, Assessing the Partisan Effects of Redistricting (1985) article
103	Curriculum Vitae of Dr. Kenneth Mayer
104	Expert Rebuttal Report of Kenneth Mayer, dated December 21, 2015
105	Expert Rebuttal Report of Kenneth Mayer, Figure A
106	Expert Rebuttal Report of Kenneth Mayer, Figure B
107	Expert Rebuttal Report of Kenneth Mayer, Figure C
108	Expert Rebuttal Report of Kenneth Mayer, Figure D
109	Expert Rebuttal Report of Kenneth Mayer, Table A
110	Expert Rebuttal Report of Kenneth Mayer, Table B
111	Expert Rebuttal Report of Kenneth Mayer, Table C
112	Expert Rebuttal Report of Kenneth Mayer, Table D
113	Expert Rebuttal Report of Kenneth Mayer, Table E
114	Amended Expert Rebuttal Report of Kenneth Mayer, dated March 31, 2016
115	Amended Expert Rebuttal Report of Kenneth Mayer, Figure E
116	Amended Expert Rebuttal Report of Kenneth Mayer, Table F
117	Amended Expert Rebuttal Report of Kenneth Mayer, Table G
118	Edward Glaeser & Bryce Ward, Myths and Realities of American Political Geography (2005) article

119	Edward Glaeser and Jacob Vigdor, The End of the Segregated Century (2012) article
120	Su-Yuel Chung & Lawrence Brown, Racial/Ethnic Sorting in Spatial Context: Testing the Explanatory Frameworks (2007) article
121	Glaeser & Ward Isolation Index Chart
122	Chart with Average Efficiency Gaps for Wisconsin Plans 1970s-2010s
123	Chart with Democratic and Republican Isolation and Clustering Scores 2004-2014
124	Chart with Breakdown of Efficiency Gap and Party Control – Historical and Current
125	Chart with Efficiency Gap Calculations for Elections Where All Races Contested
126	Declaration of Sean Trende, dated December 2, 2015
127	Curriculum Vitae of Sean Trende
128	Transcript of Sean Trende deposition, dated December 14, 2015
129	Subpoena for Sean Trende to appear at deposition, dated December 7, 2015
130	Transcript of Nicholas Goedert deposition, dated December 15, 2015
131	Fryer & Holden, Measuring the Compactness of Political Districting Plans (2011) article
132	Nicholas Goedert, Gerrymandering or Geography? How Democrats Won the Popular Vote But Lost the Congress (2012) article
133	Nicholas Goedert, The Case of Disappearing Bias: A 2014 Update to the Gerrymandering or Geography (2015)
134	Keith Gaddie April 17, 2011 Memo (Wisconsin_Partisanship.docx)
135	Subpoena for Nicholas Goedert to appear at deposition, dated December 7, 2015
136	Expert Report of Nicholas Goedert
137	Curriculum Vitae of Nicholas Goedert
138	Plaintiffs' Complaint, dated July 8, 2015
139	Goedert Calculations from Math Exercise During Deposition, dated December 15, 2015
140	Nicholas Goedert, Redistricting, Risk, and Representation (2014) article
141	Nicholas Stephanopoulos & Eric McGhee, Partisan Gerrymandering and the Efficiency Gap (2015) article
142	"Media" section from Goedert's academic home page
143	Vox article, "What is gerrymandering"
144	Vox article, "How does gerrymandering work?"
145	Vox article, "How gerrymandering is important to Republican control of the house"
146	Smith & Venables, Introduction to R (2015) article
147	Sean Trende's "Wisconsin_clustering_computation.R" file
148	Andrew Gelman & Gary King, Unified Method of Evaluating Electoral Systems and Redistricting Plans (1994) article
149	Friedman & Holden, Optimal Gerrymandering: Sometimes Pack, but Never Crack (2008) article
150	Luc Anselin, Local Indicators of Spatial Association – LISA (1995) article
151	Tam Cho, Contagion Effects and Ethnic Contribution Networks (2003) article
152	Reardon & O'Sullivan, Measures of Spatial Segregation (2004) article

153	Denton & Massey, Hypersegregation in U.S. Metropolitan Areas: Black and Hispanic Segregation Along Five Dimensions (1989) article
154	Jowei Chen Amended Proposed Amicus Brief
155	Jowei Chen Wisconsin Analysis filed with Proposed Amicus Brief
156	Jowei Chen Wisconsin Act 43 Analysis, publicly available at http://www.umich.edu/~jowei/Wisconsin_Act_43_Analysis.pdf
157	Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 2
158	Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 3
159	Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 4
160	Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 7
161	Transcript of Dr. Ronald Keith Gaddie deposition, dated March 9, 2016
162	Video deposition of Dr. Ronald Keith Gaddie, dated March 9, 2016
163	Notice of Videotaped Deposition to Dr. Gaddie
164	Green Lexar Flash Drive (produced by Gaddie at his March 9, 2016 deposition)
165	Transcript of Dr. Gaddie deposition from January 20, 2012 (<i>Baldus</i> litigation)
166	Video deposition of Dr. Ronald Keith Gaddie, dated January 20, 2012
167	Transcript of <i>Baldus</i> trial
168	Flash drive marked in <i>Baldus</i> as Ex. 57, produced by Dr. Gaddie January 20, 2012
169	Dr. Gaddie's engagement/retention letter, dated April 11, 2011
170	Flash drive produced at March 9, 2016 deposition of Dr. Gaddie with files recovered by Mark Lanterman from external hard drives
171	Photo of three hard drives
172	Plan comparisons spreadsheet (Plancomparisons.xlsm)
173	Milwaukee_Gaddie_4_16_11_v1_B , Ex. 72 in <i>Baldus</i> January 20, 2012 deposition of Dr. Gaddie
174	Milwaukee_Gaddie_4_16_11_v1_B
175	Email string between Dr. Gaddie and Joe Handrick, Tad Ottman & Adam Foltz cced, dated April 20, 2011
176	Team Map chart (from Plan Comparisons.xlsm spreadsheet)
177	Partial version of Joint Final Pretrial Report (<i>Baldus</i> litigation)
178	Exhibit A to Joint Final Pretrial Report (<i>Baldus</i> litigation)
179	Transcript from Jeff Ylvisaker deposition, dated March 11, 2016
180	30(b)(6) Subpoena sent to the Wisconsin Legislative Technology Services Bureau, dated February 12, 2016
181	Video deposition of Jeff Ylvisaker, dated April 29, 2013
182	Transcript of Jeff Ylvisaker deposition (<i>Baldus</i> case), dated April 29, 2013
183	Email from Peter Earle to Eric McLeod re: evidence preservation, dated April 10, 2012
184	Chart created by Jeff Ylvisaker, tracking Foltz/Ottman computers (exhibit 2 in Ylvisaker April 29, 2013 <i>Baldus</i> deposition)
185	LTSB configuration item dated February 18, 2016
186	Privilege log regarding LTSB decommissioning of redistricting computers, dated March 2016
187	<i>Baldus</i> 30(b)(6) subpoenas with work orders and configuration documents, dated April 2013

188	WRK32586 Responsive Spreadsheets File Detail Report.xlsx
189	WRK32586 External HD Responsive Spreadsheets File Detail Report.xlsx
190	WRK32587 Responsive Spreadsheets File Detail Report.xlsx
191	Transcript of Adam Foltz deposition, dated March 31, 2016
192	Video deposition of Adam Foltz, dated March 31, 2016
193	Subpoena for Adam Foltz to testify at a deposition, dated March 22, 2016
194	Flash drive and DVD produced by Adam Foltz, March 31, 2016
195	Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated December 21, 2011
196	Subpoena for Adam Foltz to testify at a deposition, dated December 13, 2011
197	Letter outlining Documents Produced in Response to Subpoena Issued by Plaintiffs to Adam Foltz/Foltz Privilege Log, dated December 21, 2011
198	Document produced by Foltz at December 21, 2011 deposition titled 2011-2012 Legislature SB 148 Memo 1
199	DVD identified as Adam Foltz Documents Responsive to December 13, 2011 subpoena
200	DVD identified as Adam Foltz Statewide Database
201	Order dated December 8, 2011 by U.S. District Judge J.P. Stadtmueller
202	Order dated December 20, 2011 by U.S. District Judge J.P. Stadtmueller
203	December 13, 2011 expert report of Ronald Keith Gaddie, Ph.D.
204	December 14, 2011 expert report of John Diex/Magellan Strategies BR
205	Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated February 1, 2012
206	Breakdown of Regions pdf
207	Email from Andy Speth to Judi Rhodes, Tad Ottman dated June 14, 2011
208	Email from Andy Speth to Judi Rhodes, Tad Ottman, Andy Gustofson, Adam Foltz, dated June 15, 2011
209	Email from Andy Speth to Tad Ottman, Adam Foltz, dated June 21, 2011
210	Email chain between Tad Ottman, Adam Foltz, and Michelle Litjens, dated July 7, 2011
211	Email from Andrew Welhouse dated July 8, 2011
212	Census data (exhibit 112 to February 1, 2012 Foltz deposition)
213	General Talking Points Memo by Foltz
214	Metadata document showing Adam Foltz as creator on June 20, 2011
215	Transcript of Adam Foltz 30(b)(6) Deposition from <i>Baldus</i> case, dated April 30, 2013
216	Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated April 30, 2013
217	Subpoena for Adam Foltz to appear at a deposition, dated April 22, 2013
218	Declaration of Adam Foltz, dated April 25, 2013
219	Supplement to Declaration, dated April 26, 2013
220	Defendants Rule 26(a)(1) initial disclosures, <i>Whitford</i> litigation
221	<i>Baldus</i> opinion, 849 F. Supp. 2d 840 (E.D. Wis. 2012)
222	Transcript of March 23, 2016 <i>Whitford</i> motion hearing
223	Amended Mark Lanterman Declaration and DVD (image), dated March 18, 2016
224	Curriculum Vitae of Mark Lanterman
225	Computer Forensic Services DVD
226	Transcript of Tad Ottman deposition, dated March 31, 2016

227	Video deposition of Tad Ottman, dated March 31, 2016
228	Subpoena for Tad Ottman to testify at a deposition, dated March 22, 2016
229	Flash drive and DVD produced by Tad Ottman, March 31, 2016
230	Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated December 22, 2011
231	Letter Outlining Documents Produced in Response to Subpoena Issued by Plaintiffs to Tad Ottman/Privilege Log dated December 22, 2011
232	Documents Produced by Tad Ottman
233	DVD identified as Tad Ottman Documents Responsive to December 13, 2011 Subpoena
234	Subpoena for Tad Ottman to testify at a deposition, dated December 13, 2011
235	Emails containing information that was inadvertently redacted, July 8-11, 2011
236	Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated February 2, 2012
237	Ottman Questions and Responses Document (Ottman 000095 – 000096)
238	Current Map chart and emails between Tad Ottman and Andy Speth (Ottman 000117 – 000120)
239	Email from Leah Vukmir to Tad Ottman, dated May 4, 2011 (Ottman000131.pdf)
240	Current Assembly/Senate Chart MayQandD (Ottman 000144)
241	Ottman Talking Points Memo (Ottman000141.pdf)
242	Senate District Information (Ottman 000145 – 000161)
243	Confidentiality and Nondisclosure Related to Reapportionment Agreements between Michael, Best & Friedrich and 16 Senators
244	Confidentiality and Nondisclosure Related to Reapportionment Agreements between Michael, Best & Friedrich and 58 Assembly Representatives
245	Outline for Tad Ottman testimony (Ottman 000102 – 000103)
246	Transcript of Tad Ottman 30(b)(6) deposition in <i>Baldus</i> case, dated April 30, 2013
247	List of paid staff of Senator Fitzgerald June 1, 2012 through February 28, 2013
248	Emails and documents related to SB 150
249	Email from Tad Ottman to Ray Taffora, Jim Troupis, Adam Foltz, Eric McLeod re Timeline Update, dated June 30, 2011
250	Email from Eric McLeod to Jim Troupis, Ray Taffora, Adam Foltz, Tad Ottman re Amendment on Effective Date of Redistricting, dated October 10, 2011
251	Email from Senator Fitzgerald to Tad Ottman re ALEC Conference Call on Redistricting, dated January 20, 2011
252	March 5, 2012 Letter from Eric McLeod to Douglas Poland
253	March 8, 2012 Letter from Douglas Poland to Eric McLeod
254	March 13, 2012 Letter from Eric McLeod to Douglas Poland
255	March 15, 2012 Letter from Douglas Poland to Eric McLeod
256	Email from Joseph Olson to Douglas Poland and Eric McLeod, dated March 16 and 17, 2012
257	Letter from Michael, Best & Friedrich to Ottman re: Confidentiality and Nondisclosure Related to Reapportionment dated July 27, 2010
258	Letter from Douglas Poland to Joseph Olson and Eric McLeod, dated June 13, 2012
259	Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated April 30, 2013
260	Subpoena for Tad Ottman to appear at a deposition, dated April 22, 2013

261	Declaration of Tad Ottman, dated April 25, 2013
262	GOP Seats Senate.docx
263	C_Users_afoltz_Desktop_Projects_Composite_Adam_Assertive_Curve.xlsx
264	C_Users_afoltz_Desktop_Projects_Composite_Current_Curve.xlsx
265	C_Users_afoltz_Desktop_Projects_Composite_Joe_Assertive_Curve.xlsx
266	C_Users_afoltz_Desktop_Projects_Composite_Joe_Base_Curve.xlsx
267	C_Users_afoltz_Desktop_Projects_TadAggressiveCurve.xlsx
268	C_Users_afoltz_Desktop_Projects_Team_Map_Curve.xlsx
269	C_Users_Public_Documents_Senate_Current_Curve.xlsx
270	C_Users_tottman.WRK32587_Documents_Documents_Senate_Current_Curve.xlsx
271	C_Users_tottman.WRK32587_Documents_Documents_Tad_Senate_Assertive_Curve.xlsx
272	Composite_Adam_Assertive_Curve.xlsx
273	Composite_Current_Curve.xlsx
274	Composite_Joe_Assertive_Curve.xlsx
275	Composite_Joe_Base_Curve.xlsx
276	Senate_Current_Curve.xlsx
277	Senate_Current_Curve1.xlsx
278	Tad_Senate_Assertive_Curve.xlsx
279	Tad_Senate_Assertive_Curve1.xlsx
280	TadAggressiveCurve.xlsx
281	Team_Map_Curve_Senate.xlsx
282	Team_Map_Curve.xlsx
283	Summaries.xlsx
284	Summary.xlsx
285	C:\Users\afoltz\Desktop\Workspace\Kessler\Kessler_Map_Data\asm.xls
286	C:\Users\afoltz\Desktop\Workspace\Kessler\Pass1_Key.xls
287	C:\Users\afoltz\Desktop\Workspace\Kessler\asm.xls
288	C:\Users\afoltz\Desktop\Workspace\Kessler\asm_jobs.xls
289	C:\Users\afoltz\Desktop\Workspace\Kessler\Redistricting\Kessler_Plan_061407_080707\061407_080707_Final.xls
290	Transcript of Joseph Handrick deposition, dated December 20, 2011
291	Subpoena to Joseph Handrick from Douglas M. Poland, dated December 13, 2011
292	Packet of documents produced by Joseph Handrick via Eric M. McLeod pursuant to the subpoena
293	Population Totals
294	CD labeled Joe Handrick Draft Maps – Block Assignment Files
295	February 15, 2011 Letter to Don M. Millis and Joseph W. Handrick from Eric M. McLeod re: Retention of Joseph Handrick
296	February 17, 2011 Letter to Eric M. McLeod from Don M. Millis Engagement Letter
297	February 18, 2011 Letter to Eric M. McLeod from Don M. Millis Amended Engagement Letter
298	Bio of Joseph W. Handrick from the website of Reinhart

299	Joe Handrick's lobbyist license dated January 25, 2011
300	Excerpts from the book Born to Run by Ronald Keith Gaddie
301	Defendants' Amended Initial Rule 26(a) Disclosures in <i>Baldus</i>
302	Second Amended Complaint for Declaratory and Injunctive Relief in <i>Baldus</i>
303	Defendants' Answer and Affirmative Defenses to Second Amended Complaint for Declaratory and Injunctive Relief in <i>Baldus</i>
304	Plaintiffs' First Set of Interrogatories and First Request for Production of Documents in <i>Baldus</i>
305	Chapter 801.17, Commencement of Action and Venue
306	Chapter 751, Supreme Court
307	December 2, 2011 to Kathleen Madden from Joseph Louis Olson with attached Amended Summons and Amended Complaint for Declaratory and Other Relief
308	Map entitled State of Wisconsin Act 43 Assembly Districts
309	Map entitled 2011 Act 44
310	Map entitled 2011 Act 43
311	Transcript of Joseph Handrick deposition, dated February 1, 2012
312	Letter from Eric M. McLeod to Douglas Poland with Supplemental Production in Response to Subpoenas Issued by Plaintiffs to Joe Handrick, Adam Foltz, and Tad Ottman, dated January 10, 2012
313	Letter from Eric M. McLeod to Douglas Poland with additional documents, dated January 11, 2012
314	Summary Core Constituency Report
315	Series of emails between Joseph Handrick and Jim Troupis, dated January 14, 2011
316	Series of emails between Joseph Handrick and Jim troupis, dated January 17, 2011
317	Series of emails between Joseph Handrick, Tad Ottman, dated January 25, 2011
318	Series of emails between Joseph Handrick and Jim Troupis, dated February 1, 2011
319	Emails between Joseph Handrick, Tad Ottman, dated February 14, 2011
320	Printout of menu of a disk
321	Transcript of Joseph Handrick deposition, dated April 30, 2013
322	Subpoena for Joseph Handrick to appear at a deposition dated April 22, 2013
323	Demonstrative Exhibit - Charts Tracking Vote Share, Seat Share, Efficiency Gap, and Efficiency Gap Durability for Draft Act 43 Plans
324	Demonstrative Exhibit - Charts Showing Efficiency Gap and Compliance with Traditional Criteria for Wisconsin Plans by Decade
325	Demonstrative Exhibit - Charts Showing Correlations Between Efficiency Gap and Alternative Measures of Partisan Gerrymandering
326	Demonstrative Exhibit - Charts Showing Time Trends of Efficiency Gap and Alternative Measures of Partisan Gerrymandering
327	Demonstrative Exhibit - Charts Showing Distributions of Efficiency Gap and Alternative Measures of Partisan Gerrymandering
328	Demonstrative Exhibit - Charts Showing Stability of Efficiency Gap and Alternative Measures of Partisan Gerrymandering
329	Demonstrative Exhibit - Charts Showing Values and Time Trends of Efficiency Gap and Alternative Measures of Partisan Gerrymandering for Wisconsin

330	Demonstrative Exhibit - Charts Showing Relationships Between Measures of Gerrymandering and Competitiveness
331	Wisconsin Legislative Council Act Memo: 2011 Wisconsin Act 39
332	Litigation in the 2010 Cycle, All About Redistricting, http://redistricting.ills.edu/cases.php
333	Bernard Grofman & Gary King, The Future of Partisan Symmetry as a Judicial Test for Partisan Gerrymandering After LULAC v. Perry (2007) article
334	Wisconsin State Legislature, Senate Bill 148: History, https://docs.legis.wisconsin.gov/2011/proposals/sb148
335	Joseph Handrick Timesheets April 13, 2011 to April 20, 2011
336	Joseph Handrick Timesheets May 25, 2011 to May 26, 2011
337	Joe_base_map.xlsx.pdf spreadsheet with printed metadata from Joseph Handrick's document production in January 2012
338	Joe_map_assert.xlsx.pdf spreadsheet with printed metadata from Joseph Handrick's document production in January 2012
339	Stipulation Regarding 30(b)(6) Depositions of the Legislative Technology Services Bureau and Wisconsin State Senate and Assembly, dated March 18, 2016
340	Plaintiffs' First Set of Requests for Admission and Attachments 1-9, dated February 5, 2016
341	Defendants' Response to Plaintiffs' First Set of Requests for Admission, dated March 7, 2016
342	Individual Legislator Memos and Maps from Adam Foltz to Republican Legislators (ADAMFOLZSUPPPROD000119.PDF)
343	Declaration of Mark Lanterman in <i>Baldus</i> , dated February 15, 2013
344	Declaration of Mark Lanterman in <i>Baldus</i> , dated March 11, 2013
345	Third Declaration of Mark Lanterman in <i>Baldus</i> , dated April 20, 2013
346	Email chain between Tad Ottman, Joseph Handrick, and Adam Foltz dated August 3, 2011 (Handrick000352.pdf)
347	Email chain between Eric McLeod, Tad Ottman, Adam Foltz, Sarah Troupis, Jim Troupis re: "Letters of Retention—Gaddie & Handrick," dated February 11, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)
348	Email from Jim Troupis to Eric McLeod, Adam Foltz, Tad Ottman, Sarah Troupis re: Experts and Bernard Grofman, dated June 21, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)
349	Email from Tad Ottman to Jim Troupis, Eric McLeod re: the "redistricting team," dated May 16, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)
350	Email from Tad Ottman to Eric McLeod, Jim Troupis, Raymond Taffora, Sarah Troupis, Adam Foltz re: Revised Timeline, dated July 8, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)
351	Email from Jim Troupis to Tad Ottman, Adam Foltz, Eric McLeod, Sarah Troupis re: "Gaddie & Hispanic," dated June 13, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)
352	Email chain between Tad Ottman, Eric McLeod, Jim Troupis, Adam Foltz re: Meeting with Joe Handrick, dated February 15, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)

353	Transcript of Proceedings, Joint Public Hearing on Wisconsin Redistricting Plan, dated July 13, 2011
354	June 20-24, 2011 Adam Foltz Legislator Meetings Schedule (ADAMFOLTZSUPPPROD000431.pdf)
355	Senate Motion to Hire Michael, Best & Friedrich and Troupis Law, dated January 3, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-2)
356	Assembly Motion to Hire Michael, Best & Friedrich dated January 4, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-3)
357	Letter from Democratic Leadership Protesting Hiring of Michael Best, & Friedrich, dated January 5, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-4)
358	Cartographic Boundary Shapefiles State Legislative Districts – Lower 2006
359	Cartographic Boundary Shapefiles State Legislative Districts – Census 2000
360	Email from Tad Ottman to Jim Troupis, Eric McLeod, Ray Taffora, Adam Foltz re drawing of districts, dated July 13, 2011
361	Email from Tad Ottman to Jim Troupis, Eric McLeod, Adam Foltz re: redistricting timeline, dated February 25, 2011
362	Email from Tad Ottman to Jim Troupis, Eric McLeod, Ray Taffora, Adam Foltz re: Hearing Memos, dated July 12, 2011
363	Foltz Population Deviation by Party Chart – Foltz00195
364	Tad MayQandD Chart – TADOTTMANSUPPPROD000094
365	Ottman MayQandD_base2 Chart – TADOTTMANSUPPPROD000095
366	Ottman Joe Assertive Chart - TADOTTMANSUPPPROD000097
367	Ottman MayQandD_NE Chart - TADOTTMANSUPPPROD000102.pdf
368	Demonstrative Exhibit – Act 43 Showing District by District Maps

EXHIBIT 3

Exhibit 3

Exhibits Plaintiffs May Offer if the Need Arises

Plaintiffs reserve the right to:

1. Use any exhibits listed by Defendants.
2. Use all exhibits, papers, records, and writings provided by Defendants to Plaintiffs in this case and/or attached to pleadings, papers, motions or other filings in this case.
3. Use all exhibits, papers, records, or writings attached to, filed with, or referenced in Plaintiffs' prior filings in this case, including all spreadsheets or other documents on the DVD included with the Amended Mark Lanterman Declaration, dated March 18, 2016.
4. Use all expert witness reports, reliance material, and other materials generated in preparation for trial of this lawsuit.
5. Use any newly discovered evidence, records, reports, and exhibits.
6. Supplement and/or amend this Exhibit List.
7. Plaintiffs reserve any and all objections to any and all exhibits listed by Defendants.

Plaintiffs may offer if the need arises the exhibits listed below:

Exhibit No.	Description
369	Defendants' First Set of Requests for Admission and Interrogatories, dated February 24, 2016
370	Plaintiffs' Response to Defendants' First Set of Requests for Admission, dated March 25, 2016
371	Abramowitz, Alan I., Brad Alexander, and Matthew Gunning. 2006. "Don't Blame Redistricting for Uncompetitive Elections." <i>PS: Political Science and Politics</i> 39:87-90
372	Afshartous, David and Jan de Leeuw. 2005. "Predicting in Multilevel Models." <i>Journal of Educational and Behavioral Statistics</i> 30:109-139 (No. 2)
373	Ansolabehere, Stephen and James M. Snyder. 2012. "The Effects of Redistricting on Incumbents." <i>Election Law Journal</i> 11:490-502 (No. 4)
374	Ansolabehere, Stephen and James M. Snyder, and Charles Stewart, III. 2000. "Old Voters, New Voters, and the Personal Vote: Using Redistricting to Measure the Incumbency Advantage." <i>American Journal of Political Science</i> 44:17-34 (No. 1, January)

375	Ansolabehere, Stephen and James M. Snyder, and Charles Stewart, III. 2001. "Candidate Positioning in U.S. House Elections." <i>American Journal of Political Science</i> 45:136-159 (No. 1, January)
376	Campbell, James E. 1986. "Presidential Coattails and Midterm Losses in State Legislative Elections." <i>American Political Science Review</i> 80:45-63 (No. 1, March)
377	Glazier, Amihai, Bernard Grofman, and Marc Robbins. 1987. "Partisan and Incumbency Effects of 1970s Congressional Redistricting." <i>American Journal of Political Science</i> 31:680-707 (No. 3, August)
378	Greene, William H. 1990. <i>Econometric Analysis</i> . New York: MacMillan
379	Jacobson, Gary C. 2003. "Terror, Terrain, and Turnout: Explaining the 2002 Midterm Elections." <i>Political Science Quarterly</i> 118:1-22 (No. 1, Spring)
380	Jacobson, Gary C. 2009. <i>The Politics of Congressional Elections</i> , 7th edition. New York: Pearson Longman
381	King, Gary. 1996. "Why Context Should Not Count." <i>Political Geography</i> 15:159-163 (No. 2)
382	Levendusky, Matthew S., Jeremy C. Pope, and Simon D. Jackman. 2008. "Measuring-District Level Partisanship with Implications for the Analysis of U.S. Elections." <i>The Journal of Politics</i> 70:736-753 (No. 3, July)
383	McDonald, Michael P. 2006. "Drawing the Line on District Competition." <i>PS: Political Science and Politics</i> 39:99-104 (No 1, January)
384	McDonald, Michael P. 2014. "Presidential Vote Within State Legislative Districts." <i>State Politics & Policy Quarterly</i> 14:196-204 (No. 2)
385	Pavia, Jose M. and Antonio López-Quílez. 2013. "Spatial Vote Redistribution in Redrawn Polling Units." <i>Journal of the Royal Statistical Society A</i> 176: 655-678 (Series A, Part 3)
386	Wattenberg, Martin P., Ian McAllister, and Anthony Salvanto. 2000. "How Voting is Like Taking an SAT Test: An Analysis of American Voter Runoff." <i>American Politics Quarterly</i> 28:234-250 (No. 2, April)
387	Butler, David and Donald Stokes. 1974. <i>Political Change in Britain: The Evolution of Electoral Choice</i> . London: Macmillan
388	Edgeworth, F.Y. 1898. "Applications of the Theory of Probability." <i>Journal of the Royal Statistical Society</i> 51:534
389	Kendall, M. G. and A. Stuart. 1950. "The Law of Cubic Proportion in Election Results." <i>The British Journal of Sociology</i> 1(3):183-196
390	Niemi, Richard G. and Patrick Fett. 1986. "The Swing Ratio: An Explanation and an Assessment." <i>Legislative Studies Quarterly</i> 11:75-90
391	Niemi, Richard G. and Simon Jackman. 1991. "Bias and Responsiveness in State Legislative Districting." <i>Legislative Studies Quarterly</i> 16:183-202
392	Tufte, Edward R. 1973. "The Relationship Between Seats and Votes in Two-Party Systems." <i>American Political Science Review</i> 67:540-554
393	Altman, Micah and McDonald, Michael 2010, "The Promise and Perils of Computers in Redistricting." 2010. <i>Duke Journal of Constitutional Law & Public Policy</i> 5:69-111

394	Chen, Jowei and Jonathan Rodden. 2013. "Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures." <i>Quarterly Journal of Political Science</i> 8: 239-69
395	National Conference of State Legislators. September 29, 2009. <i>Redistricting Law 2010</i>
396	Bivand, Roger, and Gianfranco Piras. 2015. "Comparing Implementations of Estimation Methods for Spatial Econometrics." <i>Journal of Statistical Software</i> 63:1-36
397	Byers, Simon and Adrian E. Raftery. 1998. "Nearest-Neighbor Clutter Removal for Estimating Features in Spatial Point Processes." <i>Journal of the American Statistical Association</i> 93:577-584
398	Clark, Philip J. and Francis C. Evans. 1954. "Distance to Nearest Neighbor as a Measure of Spatial Relationships in Populations." <i>Ecology</i> 35:445-453
399	Dawkins, Casey J. 2007. "Space and the Measurement of Income Segregation." <i>Journal of Regional Science</i> 47:255-272
400	Iceland, John, and Daniel H. Weinberg. 2002. <i>Racial and Ethnic Residential Segregation in the United States: 1980-2000</i> . Census 2000 Special Reports, CENSR-3. August
401	Moore, Dale A. and Tim E. Carpenter. 1999. "Spatial Analytical Methods and Geographic Information Systems: Use in Health Research and Epidemiology." <i>Epidemiologic Reviews</i> 21:143-161
402	2000s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/redsum2000/redsum2000.htm#AL
403	1990s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/redout.htm
404	1980s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/Redsum1980/redsum1980.htm
405	Michael McDonald & Robin Best, Unfair Partisan Gerrymanders in Politics and Law: A Diagnostic Applied to Six Cases, 14 Election Law Journal 312 (2015)
406	Eric McGhee, Measuring Efficient Partisan Bias (2016), prepared for the Annual Conference of the Midwest Political Science Association April 7-10, 2016.
407	John Nagle, How Competitive Should a Fair Single Member Districting Plan Be? (2016)
408	Samuel Wang, Three Tests for Practical Evaluation of Partisan Gerrymandering, 68 Stanford Law Review (2016)
409	Laughlin McDonald, The Looming 2010 Census: A Proposed Judicially Manageable Standard and Other Reform Options for Partisan Gerrymandering, 46 Harv J Legis 243 (2009)
410	Easha Anand, Finding a Path through the Political Thicket: In Defense of Partisan Gerrymandering's Justiciability, 102 Cal L Rev 917 (2014)
411	Brief of Amici Curiae Professors Gary King, Bernard Grofman, Andrew Gelman, and Jonathan N. Katz, in Support of Neither Party, League of United

	Latin American Citizens v. Perry, No. 05-204 (available on Westlaw at 2006 WL 53994)
412	Nicholas Stephanopoulos, Spatial Diversity, 125 Harv L Rev 1903 (2012)
413	Boris Shor and Nolan McCarty, The Ideological Mapping of American Legislatures, 105 Am Pol Sci Rev 530 (2011)
414	Andrew Gelman and Gary King, Enhancing Democracy through Legislative Redistricting, 88 Am Pol Sci Rev 541 (1994)
415	Gary King and Robert X. Browning, Democratic Representation and Partisan Bias in Congressional Elections, 81 Am Pol Sci Rev 1251 (1987)
416	Samuel Issacharoff, Pamela S. Karlan, and Richard H. Pildes, The Law of Democracy: Legal Structure of the Political Process (Thomson Reuters 4 th ed 2012)
417	Simon Jackman, Measuring Electoral Bias: Australia, 1949-93, 24 Brt J Pol Sci 319 (1994)
418	Nicholas Stephanopoulos, The Consequences of Consequentialist Criteria, 3 UC Irvine L Review 669 (2013)
419	Arden Rowell and Jessica Bregant, Numeracy and Legal Decision Making, 46 Ariz St L J 191 (2014)
420	Jeffrey A. Taylor, Paul S. Herrnson, and James M. Curry, The Impact of Multimember Districts on Legislative Effort and Success
421	Lani Guinier, Groups, Representation, and Race-Conscious Districting: A Case of the Emperor's Clothes, 71 Tex L Rev 1589 (1993)
422	Guillermo Owen and Bernard Grofman, Optimal Partisan Gerrymandering, 7 Pol Geography Q 5 (1988)
423	Jason Mercier, Proposed Constitutional Amendments Would Require Supermajority Vote for Tax Increases (Washington Policy Center, Feb 2013)
424	Janet Campagna and Bernard Grofman, Party Control and Partisan Bias in 1980s Congressional Redistricting, 52 J Politics 1242 (1990)
425	Gary W. Cox and Jonathan N. Katz, The Reapportionment Revolution and Bias in U.S. Congressional Elections, 43 Am J Pol Sci 812 (1999)
426	Christian R. Grose and Bruce I. Oppenheimer, The Iraq War, Partisanship, and Candidate Attributes: Variations in Partisan Swing in the 2006 U.S. House Elections, 32 Legis Stud Q 531 (2007)
427	Jenni Newton-Farrelly, Wrong Winner Election Outcomes in South Australia: Bias, Minor Parties and Non-uniform Swings (South Australian Parliament Research Library, Apr 1, 2010)
428	Adam B. Cox, Partisan Gerrymandering and Disaggregated Redistricting, 2004 S Ct Rev 409
429	John Sides and Eric McGhee, Redistricting Didn't Win Republicans the House (Wash Post Wonkblog, Feb 17, 2013)
430	Tony L. Hill, Electoral Bias and the Partisan Impact of Independent Redistricting Bodies: An Analysis Incorporating the Brookes Method (presented at the Annual Conference of the Midwest Political Science Association, Apr 2008)
431	Anthony J. McGann, Charles A. Smith, James A. Keena, Revenge of the Anti-federalists: Constitutional Implications of Redistricting (2014)

432	Andrew J. Taylor, <i>Elephant's Edge: The Republicans as a Ruling Party</i> (Praeger 2005)
433	David Epstein et al, Estimating the Effect of Redistricting on Minority Substantive Representation, 23 J L, Econ & Org 499 (2007)
434	Kevin A. Hill, Does the Creation of Majority Black Districts Aid Republicans? An Analysis of the 1992 Congressional Elections in Eight Southern States, 57 J Politics 384 (1995)
435	David Lublin and D. Stephen Voss, Racial Redistricting and Realignment in Southern State Legislatures, 44 Am J Pol Sci 792 (2000)
436	Jonathan Winburn, <i>The Realities of Redistricting: Following the Rules and Limiting Gerrymandering in State Legislative Redistricting</i> (Lexington 2008)
437	Todd Makse, Defining Communities of Interest in Redistricting through Initiative Voting, 11 Election L J 503 (2012)
438	Adam B. Cox and Richard T. Holden, Reconsidering Racial and Partisan Gerrymandering, 78 U Chi L Rev 553 (2011)
439	Jonathan Rodden, The Geographic Distribution of Political Preferences, 13 Ann Rev Pol Sci 321 (2010)
440	Altman, Micah. 2002. "A Bayesian Approach to Detecting Electoral Manipulation." <i>Political Geography</i> 21:39-48
441	Born, Richard. 1985. "Partisan Intentions and Election Day Realities in the Congressional Redistricting Process." <i>The American Political Science Review</i> 79 (2): 305-19
442	Brace, Kimball, Bernard Grofman, and Lisa Handley. 1987. "Does Redistricting Aimed to Help Blacks Necessarily Help Republicans?" <i>Journal of Politics</i> 49(1): 169-85
443	Brookes, Ralph Herbert. 1959. "Electoral Distortion in New Zealand." <i>The Australian Journal of Politics and History</i> 5: 218-23
444	Cain, Bruce E. 1984. <i>The Reapportionment Puzzle</i> . Berkeley: University of California Press
445	Campbell, James E. 1996. <i>Cheap Seats: The Democratic Party's Advantage in U.S. House Elections</i> . Columbus: The Ohio State University Press
446	Chen, Jowei and Jonathan Rodden. 2011. "Using Legislative Districting Simulations to Measure Electoral Bias in Legislatures." Presented at the annual meeting of the Midwest Political Science Association, Chicago
447	Engstrom, Erik J. 2006. "Stacking the States, Stacking the House: The Partisan Consequences of Congressional Redistricting in the 19 th Century." <i>American Political Science Review</i> 100 (03): 419-27
448	Erikson, Robert S. 1972. "Malapportionment, Gerrymandering, and Party Fortunes in Congressional Elections." <i>American Political Science Review</i> 66 (4): 1234-45
449	Gelman, Andrew, Gary King, and Andrew C. Thomas. 2008. "JudgeIt II: A Program for Evaluating Electoral Systems and Redistricting Plans."
450	Gilligan, Thomas W., and John G. Matsusaka. 1999. "Structural Constraints on Partisan Bias Under the Efficient Gerrymander." <i>Public Choice</i> 100: 65-84
451	Grofman, Bernard, William Koetzle, and Thomas Brunell. 1997. "An Integrated Perspective on the Three Potential Sources of Partisan Bias:

	Malapportionment, Turnout Differences, and the Geographic Distribution of Party Vote Shares.” <i>Electoral Studies</i> 16(4): 457-70
452	Kastellec, Jonathan P., Andrew Gelman, and Jamie P. Chandler. 2008. “The Playing Field Shifts: Predicting the Seats-Votes Curve in the 2008 U.S. House Elections.” <i>PS: Political Science & Politics</i> 41 (4): 729-32
453	Kousser, J. Morgan. 1996. “Estimating the Partisan Consequences of Redistricting Plans-Simply.” <i>Legislative Studies Quarterly</i> 21 (4): 521-41
454	McDonald, Michael P. 2004. “A Comparative Analysis of Redistricting Institutions in the United States, 2001-02.” <i>State Politics & Policy Quarterly</i> 4(4): 371-95
455	National Conference of State Legislatures Reapportionment Task Force. 1989. “Redistricting Provisions: 50 State Profiles.” Washington, DC: National Conference of State Legislatures
456	Niemi, Richard G. and John Deegan, Jr. 1978. “A Theory of Political Districting.” <i>The American Political Science Review</i> 72 (4): 1304-23
457	Shotts, Kenneth W. 2001. “The Effect of Majority-Minority Mandates on Partisan Gerrymandering.” <i>American Journal of Political Science</i> 45 (1):120-35
458	Soper, C.S. and Joan Rydon. 1958. “Under-Representation and Electoral Participation.” <i>The Australian Journal of Politics and History</i> 4 (1): 94-106
459	Taagepera, Rein, and Matthew Soberg Shugart. 1989. <i>Seats and Votes: The Effects and Determinants of Electoral Systems</i> . New Haven, CT: Yale University Press.
460	Yoshinaka, Antoine, and Chad Murphy. 2009. “Partisan Gerrymandering and Population Instability: Completing the Redistricting Puzzle.” <i>Political Geography</i> 28: 451-62.