

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

WILLIAM WHITFORD, ROGER ANCLAM,)
EMILY BUNTING, MARY LYNNE DONOHUE,)
HELEN HARRIS, WAYNE JENSEN,)
WENDY SUE JOHNSON, JANET MITCHELL,)
ALLISON SEATON, JAMES SEATON,)
JEROME WALLACE, and DONALD WINTER,)

No. 15-cv-421-bbc

Plaintiffs,)

v.)

GERALD C. NICHOL, THOMAS BARLAND,)
JOHN FRANKE, HAROLD V. FROEHLICH,)
KEVIN J. KENNEDY, ELSA LAMELAS, and)
TIMOTHY VOCKE,)

Defendants.)

PLAINTIFFS' SUPPLEMENTAL UNOPPOSED FINDING OF FACT

On May 18, 2016 the parties met and conferred by phone, and agreed that the following proposed finding of fact can be deemed uncontested:

457. On December 20, 2011, during his deposition in *Baldus v. Brennan*, Joseph W.

Handrick was asked following questions and gave the following answers:

Q: In your opinion did the partisan makeup of the districts come into play when drawing the maps?

A: In the maps I drew, no.

Q: Did they come into play in the map that was enacted in Act 43?

A: I don't know.

Q: Were partisan considerations a factor in the drawing of the plan that was enacted in Act 43?

A: I don't know.

Q: When you were working during the redistricting process, did you have any access to voting data from past elections?

A: No.

Baldus v. Brennan, No. 2:11-cv-00562-JPS-DPW-RMD (E.D. Wis.), Deposition of Joseph W. Handrick at 217:2 – 18 (Dec. 20, 2011).

Dated May 19, 2016

LAW OFFICE OF PETER G. EARLE

By: /s/ Peter. G. Earle

Peter G. Earle
SBN 1012176
839 North Jefferson Street, Suite 300
Milwaukee, WI 53202
(414) 276-1076
peter@earle-law.com

Attorney for the Plaintiffs