

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

---

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

No. 15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

---

**SECOND DECLARATION OF RUTH M. GREENWOOD IN SUPPORT OF  
PLAINTIFFS' MOTION TO ADMIT IN EVIDENCE TESTIMONY BY DEPOSITION  
DESIGNATIONS OF ANY PLAINTIFF WHO DOES NOT TESTIFY LIVE AT TRIAL**

---

I, Ruth M. Greenwood, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am one of the attorneys representing the Plaintiffs in the above-captioned action.

I make this Affidavit on personal knowledge of the facts and circumstances set forth herein.

2. Attached as Exhibit 1 is a true and correct copy of Wisconsin Election Commission Defendants' Response to Plaintiffs' First Set of Requests for Admissions to Defendants Gill, et al., dated June 14, 2019.

Dated this 25th day of June, 2019.

/s/ Ruth M. Greenwood  
Ruth M. Greenwood

William Whitford v. Gill  
15-cv-jdp

**Exhibit 1**

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

---

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

Case No. 15-CV-421-JDP

BEVERLY R. GILL, et al.,

Defendants.

---

**DEFENDANTS' RESPONSE TO PLAINTIFFS' FIRST SET OF  
REQUESTS FOR ADMISSIONS TO DEFENDANTS GILL, ET AL.**

---

Pursuant to Federal Rule of Civil Procedure 36, the Wisconsin Election Commission Defendants (Beverly R. Gill et. al) respond to the Plaintiffs Requests for Admission, served on June 15, 2019, as follows.

**GENERAL OBJECTIONS**

1. The defendants object to the Instructions and the Requests for Admissions to the extent they attempt to impose any obligation or burden other than or beyond those imposed by Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure. other than those contained in the Federal Rules of Civil Procedure

2. The defendants object to the Requests for Admissions to the extent that they seek information that is not in the possession, custody, or control of the

defendants. The defendants will respond to the Requests for Admissions with respect to information currently known and available to them or that can be obtained through reasonable effort.

3. The defendants object to the Requests for Admissions to the extent that they do not request information with reasonable particularity.

4. The defendants object to the Requests for Admissions in that they are overly broad and unduly burdensome.

## **RESPONSES TO REQUESTS FOR ADMISSION**

### **Request for Admission No. 1**

Admit that Plaintiff Sara Ramaker lives at 2545 Oakwood Avenue, Green Bay, WI 54301, which is located in Assembly District 4 in Act 43.

**RESPONSE:** Admit.

### **Request for Admission No. 2**

Admit that Plaintiff Sara Ramaker is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

### **Request for Admission No. 3**

Admit that Plaintiff Sara Ramaker is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as

vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Ramaker usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 4**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 4 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 4 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 5**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 4 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether District 4 was more likely to elect a Republican than a Democratic

Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 6**

Admit that the legislators and legislative aides involved in drafting in Act 43 expected District 4 in Act 43 to have a Republican vote share of 53.47%, an increase from the pre-Act 43 Republican vote share of 53.31%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 4’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 7**

Admit that it is possible to draw a district including Plaintiff Sara Ramaker’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 8**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 4 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 9**

Admit that Plaintiff Linea Sundstrom lives at 1320 E. Lake Bluff Boulevard, Shorewood, WI 53211, which is located in Assembly District 10 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 10**

Admit that Plaintiff Linea Sundstrom is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 11**

Admit that Plaintiff Linea Sundstrom is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies.

The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Sundstrom usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 12**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 10 in Act 43 to have a Republican vote share of 12.59%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 10’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 13**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for District 10 in Act 43 to have a high concentration of Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are



unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 10 in Act 43 intended to have a high concentration of Democratic voters and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 14**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 10 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 10 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 15**

Admit that it was possible to draw District 10 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms "Republican vote share" and "likelihood of a Democratic Representative to the Assembly being elected" as undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of these terms and the absence of any other criteria by which this hypothetical

alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 16**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 10 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ knowledge of whether District 10 could have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being

elected, whatever that meaning that term may have. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 17**

Admit that the Democratic candidate for State Assembly in Assembly District 10 prevailed in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 18**

Admit that Plaintiff Warren Braun lives at 8220 Harwood Avenue, Apt. 341 Wauwatosa, WI 53213, which is located in Assembly District 13 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 19**

Admit that Plaintiff Warren Braun is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 20**

Admit that Plaintiff Warren Braun is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Braun usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 20**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 13 in Act 43, they intended for the district to become more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 13 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 21**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 13 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 13 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 22**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 13 in Act 43 to have a Republican vote share of 58.67%, an increase from the pre-Act 43 Republican vote share of 43.67%.

**RESPONSE:** The defendants object that the term “Republican vote share” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 13’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 23**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that the pre-Act 43 District 13 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether pre-Act 43 District 13 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 24**

Admit that it is possible to draw a district including Plaintiff Warren

Braun's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 25**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 13 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 26**

Admit that Plaintiff Sandra Carlson-Kaye lives at 511 N. 33rd Street, Milwaukee, WI 53208, which is located in Assembly District 18 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 27**

Admit that Plaintiff Sandra Carlson-Kaye is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 28**

Admit that Plaintiff Sandra Carlson-Kaye is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object that the term “Democratic . . . policies” is undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Carlson-Kaye usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 29**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 18 in Act 43 to have a Republican vote share of 14.94%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 18’s Republican vote share would be in elections under Act 43 and cannot obtain such knowledge through

reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 30**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for Assembly District 18 in Act 43 to have a high concentration of Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ intentions on whether District 18 would have a high concentration of Democratic voters. And cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 31.**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 18 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether District 18 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.



**Request for Admission No. 32**

Admit that it was possible to draw District 18 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” are undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 33**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 18 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ knowledge of whether District 18 could have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 34**

Admit that the Democratic candidate for State Assembly prevailed in Assembly District 18 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 35**

Admit that Plaintiff Guy Costello lives at 1320 Manitowoc Avenue, South Milwaukee, WI 53172, which is located in Assembly District 21 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 36**

Admit that Plaintiff Guy Costello is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 37**

Admit that Plaintiff Guy Costello is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Costello usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 38**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 21 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 21 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 39**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 21 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 21 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 40**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 21 in Act 43 to have a Republican vote share of 52.94%, an increase from the pre-Act 43 Republican vote share of 51.92%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 21's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 41**

Admit that it is possible to draw a district including Plaintiff Guy

Costello's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 42**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 21 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 43**

Admit that Plaintiff Helen Harris lives at 6761 N. 109th Street, Milwaukee, WI 53224, which is located in Assembly District 22 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 44**

Admit that Plaintiff Helen Harris is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 45**

Admit that Plaintiff Helen Harris is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Harris usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 46**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 22 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 22 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 47**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 22 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 22 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 48**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 22 in Act 43 to have a Republican vote share of 66.82%, an increase from the pre-Act 43 Republican vote share of 39.05%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 22's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 49**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that the pre-Act 43 District 22 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether pre-Act 43 District 22 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 50**

Admit that it is possible to draw a district including Plaintiff Helen Harris's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite



number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 51**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 22 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 52**

Admit that Plaintiff Elizabeth Lentini lives at 5525 N. Hollywood Avenue, Whitefish Bay, WI 53217, which is located in Assembly District 23 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 53**

Admit that Plaintiff Elizabeth Lentini is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 54**

Admit that Plaintiff Elizabeth Lentini is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the

defendants can only admit that Lentini usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 55**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 23 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 23 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 56**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 23 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 23 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through

reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 57**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 23 in Act 43 to have a Republican vote share of 57.64%, an increase from the pre-Act 43 Republican vote share of 51.70%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 23’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 58**

Admit that it is possible to draw an assembly district including Plaintiff Elizabeth Lentini’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 59**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 23 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 60**

Admit that Plaintiff Michael Switzenbaum lives at 4907 N. Idlewild Avenue, Whitefish Bay, WI 53217, which is located in Assembly District 23 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 61**

Admit that Plaintiff Michael Switzenbaum is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 62**

Admit that Plaintiff Michael Switzenbaum is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies.

The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Switzenbaum usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 63**

Admit that it is possible to draw an assembly district including Plaintiff Michael Switzenbaum’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 64**

Admit that Plaintiff Jerome Wallace lives at 500 W. Bradley Road, Apt.

B302, Fox Point, WI 53217, which is located in Assembly District 23 in Act 43.

**RESPONSE:** The defendants admit this request other than the apartment number. Mr. Wallace is registered to vote at Apartment 308B at the address listed in the request.

**Request for Admission No. 65**

Admit that Plaintiff Jerome Wallace is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 66**

Admit that Plaintiff Jerome Wallace is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Wallace usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 67**

Admit that it is possible to draw an assembly district including Plaintiff Jerome Wallace’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 68**

Admit that Plaintiff Deborah Patel lives at 9130 N. Spruce Road, Milwaukee, WI 53217, which is located in Assembly District 24 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 69**

Admit that Plaintiff Deborah Patel is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 70**

Admit that Plaintiff Deborah Patel is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Patel usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 71**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 24 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 24 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 72**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 24 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.



**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 24 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 73**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 24 in Act 43 to have a Republican vote share of 58.49%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 24's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 74**

Admit that it is possible to draw an assembly district including Plaintiff Deborah Patel's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of

this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 75**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 24 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 76**

Admit that Plaintiff Jennifer Estrada lives at 919 537th Street, Manitowoc, WI 54220, which is located in Assembly District 25 in Act 43.

**RESPONSE:** The defendants admit that Jennifer Estrada lives in Manitowoc and resides in Assembly District 25. The defendants deny the address listed in the request because she is registered to vote at 919 S. 37th St. in Manitowoc.

**Request for Admission No. 77**

Admit that Plaintiff Jennifer Estrada is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 78**

Admit that Plaintiff Jennifer Estrada is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Estrada usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 79**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 25 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 25 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 80**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 25 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 25 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 81**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 25 in Act 43 to have a Republican vote share of 53.26%, an increase from the pre-Act 43 Republican vote share of 52.79%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 25's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 82**

Admit that it is possible to draw an assembly district including Plaintiff

Jennifer Estrada's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 83**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 25 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 84**

Admit that Plaintiff Mary Lynne Donohue lives at 418 Saint Clair Avenue, Sheboygan, WI 53081, which is located in Assembly District 26 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 85**

Admit that Plaintiff Mary Lynne Donohue is a qualified, registered voter

in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 86**

Admit that Plaintiff Mary Lynne Donohue is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Donohue usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 87**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 26 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 26 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot

obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 88**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 26 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 26 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 89**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 26 in Act 43 to have a Republican vote share of 55.97%, an increase from the pre-Act 43 Republican vote share of 45.42%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 26's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 90**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that the pre-Act 43 District 26 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether pre-Act 32 District 26 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 91**

Admit that it is possible to draw an assembly district including Plaintiff Mary Lynne Donohue's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite



number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 92**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 26 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 93**

Admit that Plaintiff Barbara Flom lives at N7198 190th Street, Knapp, WI 54749, which is located in Assembly District 29 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 94**

Admit that Plaintiff Barbara Flom is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 95**

Admit that Plaintiff Barbara Flom is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Flom usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 96**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 29 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 29 in Act 43 intended to be more likely to elect a Republican than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 97**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 29 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 29 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 98**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 29 in Act 43 to have a Republican vote share of 50.97%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 29’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 99**

Admit that it is possible to draw an assembly district including Plaintiff Barbara Flom’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 100**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 29 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 101**

Admit that Plaintiff Roger Anclam lives at 7928 S. Butterfly Road, Beloit, WI 53511, which is located in Assembly District 31 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 102**

Admit that Plaintiff Roger Anclam is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 103**

Admit that Plaintiff Roger Anclam is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Anclam usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 104**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 31 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 31 in Act 43 intended that the district be more likely to elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 105**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 31 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 31 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 106**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 31 in Act 43 to have a Republican vote share of 56.33%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 31’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 107**

Admit that it is possible to draw an assembly district including Plaintiff Roger Anclam’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 108**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 31 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 109**

Admit that Plaintiff Hans Breitenmoser lives at W6982 Joe Snow Road, Merrill, WI 54452, which is located in Assembly District 35 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 110**

Admit that Plaintiff Hans Breitenmoser is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 111**

Admit that Plaintiff Hans Breitenmoser is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Breitenmoser usually votes for Democratic

candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 112**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 35 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 35 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 113**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 35 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 35 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.



**Request for Admission No. 114**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 35 in Act 43 to have a Republican vote share of 52.99%, an increase from the pre-Act 43 Republican vote share of 52.30%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 35’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 115**

Admit that it is possible to draw an assembly district including Plaintiff Hans Breitenmoser’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 116**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 35 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 117**

Admit that Plaintiff Graham Adsit lives at 314 Spring Street, Cambridge, WI 53523, which is located in Assembly District 38 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 118**

Admit that Plaintiff Graham Adsit is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 119**

Admit that Plaintiff Graham Adsit is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Adsit usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 120**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 38 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 38 in Act 43 intended to increase the district would be more likely to elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 121**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 38 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 38 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 122**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 38 in Act 43 to have a Republican vote share of 60.45%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 38’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 123**

Admit that it is possible to draw an assembly district including Plaintiff Graham Adsit’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 124**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 38 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 125**

Admit that Plaintiff James Seaton lives at W11435 Bay Drive, Lodi, WI 53555, which is located in Assembly District 42 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 126**

Admit that Plaintiff James Seaton is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 127**

Admit that Plaintiff James Seaton is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Seaton usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 128**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 42 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 42 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 129**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 42 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 42 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 130**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 42 in Act 43 to have a Republican vote share of 54.94%, an increase from the pre-Act 43 Republican vote share of 48.54%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 42’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 131**

Admit that it is possible to draw an assembly district including Plaintiff James Seaton’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 132**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 42 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 133**

Admit that Plaintiff Allison Seaton lives at W11435 Bay Drive, Lodi, WI 53555, which is located in Assembly District 42 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 134**

Admit that Plaintiff Allison Seaton is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 135**

Admit that Plaintiff Allison Seaton is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Seaton usually votes for Democratic candidates



and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 136**

Admit that it is possible to draw an assembly district including Plaintiff Allison Seaton's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 137**

Admit that Plaintiff Judith Brey lives at 2101 Winfield Drive, Reedsburg, WI 53959, which is located in Assembly District 50 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 138**

Admit that Plaintiff Judith Brey is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 139**

Admit that Plaintiff Judith Brey is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Adsit usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 140**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 50 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 50 in Act 43 intended for the district to be more likely to elect a Republican rather than a Democratic candidate to the Assembly and cannot

obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 141**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 50 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 50 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 142**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 50 in Act 43 to have a Republican vote share of 52.06%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 50's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 143**

Admit that it is possible to draw an assembly district including Plaintiff Judith Brey's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 144**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 50 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 145**

Admit that Plaintiff Michael Lecker lives at 401 E. Broadway Drive, Appleton, WI 54913, which is located in Assembly District 56 in Act 43.

**RESPONSE:** The defendants admit the request except for Appleton. Mr. Lecker is registered to vote at 401 E. Broadway Drive in Grand Chute, Wisconsin.

**Request for Admission No. 146**

Admit that Plaintiff Michael Lecker is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 147**

Admit that Plaintiff Michael Lecker is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Lecker usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 148**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 56 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 56 in Act 43 intended for the district to be more likely to elect a

Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 149**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 56 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 56 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 150**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 56 in Act 43 to have a Republican vote share of 58.86%.

**RESPONSE:** Denied.

**Request for Admission No. 151**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 56 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 152**

Admit that Plaintiff Norah McCue lives at 1112 Russet Street, Racine,

WI 53405, which is located in Assembly District 62 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 153**

Admit that Plaintiff Norah McCue is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 154**

Admit that Plaintiff Norah McCue is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that McCue usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 155**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 62 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 62 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 156**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 62 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 62 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 157**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 62 in Act 43 to have a Republican vote share of 56.56%, an increase from the pre-Act 43 Republican vote share of 44.35%.

**RESPONSE:** The defendants object that the term "Republican vote share" is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators



and legislative aides had regarding what District 62's vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 158**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that the pre-Act 43 District 62 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether pre-Act 43 District 62 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 159**

Admit that it is possible to draw an assembly district including Plaintiff Norah McCue's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 160**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 62 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 161**

Admit that Plaintiff Timothy B. Daley lives at 1202 Vine Street, Union Grove, WI 53182, which is located in Assembly District 63 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 162**

Admit that Plaintiff Timothy B. Daley is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 163**

Admit that Plaintiff Timothy B. Daley is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as

vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Daley usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 164**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 63 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 63 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 165**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 63 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether District 63 was more likely to elect a Republican than a Democratic

Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 166**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 63 in Act 43 to have a Republican vote share of 59.64%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 63’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 167**

Admit that it is possible to draw an assembly district including Plaintiff Timothy B. Daley’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 168**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 63 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 169**

Admit that Plaintiff Janet Mitchell lives at 2411 Mount Pleasant Street, Racine, WI 53404, which is located in Assembly District 66 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 170**

Admit that Plaintiff Janet Mitchell is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 171**

Admit that Plaintiff Janet Mitchell is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as

vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Mitchell usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 172**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 66 in Act 43 to have a Republican vote share of 31.71%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 66’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 173**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for District 66 in Act 43 to have a high concentration of Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge whether

the legislators and legislative aides in drafting District 66 in Act 43 intended to have a high concentration of Democratic voters and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 174**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 66 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 66 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 175**

Admit that it was possible to draw District 66 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms "Republican vote share" and "likelihood of a Democratic Representative to the Assembly being elected" as undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of these terms and the absence of any other criteria by which this hypothetical

alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 176**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 66 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. The defendants unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ knowledge of whether District 66 could have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being



elected, whatever that meaning that term may have. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 177**

Admit that the Democratic candidate for State Assembly prevailed in Assembly District 66 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 178**

Admit that Plaintiff Jane Pedersen lives at N7527 537th Street, Menomonie, WI 54751, which is located in Assembly District 67 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 179**

Admit that Plaintiff Jane Pedersen is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 180**

Admit that Plaintiff Jane Pedersen is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Mitchell usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 181**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 67 in Act 43, they intended for the district to be more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 67 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 182**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 67 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 67 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 183**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 67 in Act 43 to have a Republican vote share of 51.67%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 67’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 184**

Admit that it is possible to draw an assembly district including Plaintiff Jane Pedersen’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 185**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 67 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 186**

Admit that Plaintiff Daniel Dieterich lives at 1490 Evergreen Drive, Stevens Point, WI 54482, which is located in Assembly District 70 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 187**

Admit that Plaintiff Daniel Dieterich is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 188**

Admit that Plaintiff Daniel Dieterich is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Dieterich usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 189**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 70 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 70 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 190**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 70 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 70 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 191**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 70 in Act 43 to have a Republican vote share of 50.73%, an increase from the pre-Act 43 Republican vote share of 49.74%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 70’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 192**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that the pre-Act 43 District 70 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether pre-Act 43 District 70 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 193**

Admit that it is possible to draw an assembly district including Plaintiff

Daniel Dieterich's home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term "Democratic vote share" is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 194**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 70 in the 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 195**

Admit that Plaintiff Leah Dudley lives at 2917 Wimbledon, Way, Madison, WI 53713, which is located in Assembly District 77 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 196**

Admit that Plaintiff Leah Dudley is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 197**

Admit that Plaintiff Leah Dudley is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Dudley usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 198**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 77 in Act 43 to have a Republican vote share of 19.23%, a decrease from the pre-Act 43 Republican vote share of 23.88%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 77’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable



inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 199**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for Assembly District 77 in Act 43 to have a high concentration of Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 77 in Act 43 intended to have a high concentration of Democratic voters and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 200**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 77 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 77 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 201**

Admit that it was possible to draw District 77 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of these terms and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 202**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 77 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether District 77 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 203**

Admit that the Democratic candidate for State Assembly prevailed in Assembly District 77, without being challenged, in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 204**

Admit that Plaintiff Ann Wolfe lives at 6154 Brotherhood Lane, Ridgeway, WI 53582, which is located in Assembly District 80 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 205**

Admit that Plaintiff Ann Wolfe is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 206**

Admit that Plaintiff Ann Wolfe is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Wolfe usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 207**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 80 in Act 43 to have a Republican vote share of 38.55%, a decrease from the pre-Act 43 Republican vote share of 42.15%.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 80 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 208**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for Assembly District 80 in Act 43 to have a high concentration of

Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 80 in Act 43 intended to have a high concentration of Democratic voters and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 209**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 80 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ opinions on whether District 80 was more likely to elect a Democratic than a Republican Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 210**

Admit that it was possible to draw District 80 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of these terms and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 211**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 80 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 80’s vote share would be in

elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 212**

Admit that the Democratic candidate for State Assembly prevailed in Assembly District 80, in the 2012, 2014, 2016, and 2018 elections, including without challenge in some years.

**RESPONSE:** Admit.

**Request for Admission No. 213**

Admit that Plaintiff Edward Wohl lives at 6154 Brotherhood Lane, Ridgeway, WI 53582, which is located in Assembly District 80 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 214**

Admit that Plaintiff Edward Wohl is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 215**

Admit that Plaintiff Edward Wohl is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for

Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Wohl usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 216**

Admit that Plaintiff Nancy Petulla lives at 10185 S. County Road K, Merrill, WI 54452, which is located in Assembly District 86 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 217**

Admit that Plaintiff Nancy Petulla is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 218**

Admit that Plaintiff Nancy Petulla is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Petulla usually votes for Democratic candidates



and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 219**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 86 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 86 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 220**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 86 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 86 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 221**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 86 in Act 43 to have a Republican vote share of 55.08%, an increase from the pre-Act 43 Republican vote share of 54.56%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 86’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 222**

Admit that it is possible to draw an assembly district including Plaintiff Nancy Petulla’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 223**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 86 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 224**

Admit that Plaintiff Gail Hohenstein lives at 1823 Beethoven Drive, Green Bay, WI 54311, which is located in Assembly District 88 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 225**

Admit that Plaintiff Gail Hohenstein is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 226**

Admit that Plaintiff Gail Hohenstein is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Hohenstein usually votes for Democratic

candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 227**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 88 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 88 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 228**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 88 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 88 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 229**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 88 in Act 43 to have a Republican vote share of 53.19%, an increase from the pre-Act 43 Republican vote share of 44.85%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 88’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 230**

Admit that it is possible to draw an assembly district including Plaintiff Gail Hohenstein’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 231**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 88 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 232**

Admit that Plaintiff Robert Pfundheller lives at 1115 Sweetwater Close, Altoona, WI 54720, which is located in Assembly District 93 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 233**

Admit that Plaintiff Robert Pfundheller is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 234**

Admit that Plaintiff Robert Pfundheller is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Pfundheller usually votes for Democratic

candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 235**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 93 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 93 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 236**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 93 in Act 43 was more likely to elect a Republican than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 93 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 237**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 93 in Act 43 to have a Republican vote share of 51.10%, an increase from the pre-Act 43 Republican vote share of 44.73%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 93’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 238**

Admit that it is possible to draw an assembly district including Plaintiff Robert Pfundheller’s home that would have a Democratic vote share that exceeds 50.00%.

**RESPONSE:** The defendants object that the term “Democratic vote share” is undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of this term and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite



number of districts could be drawn such that at least one would likely exceed 50.00% Democratic vote share, whatever meaning that term may have.

**Request for Admission No. 239**

Admit that the Republican candidate for State Assembly prevailed in Assembly District 93 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 240**

Admit that Plaintiff Brent Brigson lives at W3831 Southern Drive, West Salem, WI 54669, which is located in Assembly District 94 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 241**

Admit that Plaintiff Brent Brigson is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 242**

Admit that Plaintiff Brent Brigson is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Brigson usually votes for Democratic candidates

and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 243**

Admit that when the legislators and legislative aides involved in drafting Act 43 redrew Assembly District 94 in Act 43, they intended to increase the likelihood that the district would elect a Republican rather than a Democratic Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 94 in Act 43 intended to increase the likelihood the district would elect a Republican rather than a Democratic candidate to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 244**

Admit that the legislators and legislative aides involved in drafting Act 43 expected District 94 in Act 43 to have a Republican vote share of 51.91%, an increase from the pre-Act 43 Republican vote share of 51.57%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 94’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable

inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 245**

Admit that Plaintiff Rosalie Schnick lives at 3039 Edgewater Lane, La Crosse, WI 54603, which is located in Assembly District 95 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 246**

Admit that Plaintiff Rosalie Schnick is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 247**

Admit that Plaintiff Rosalie Schnick is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Schnick usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 248**

Admit that the legislators and legislative aides involved in drafting Act 43 expected Assembly District 95 in Act 43 to have a Republican vote share of 36.36%.

**RESPONSE:** The defendants object that the term “Republican vote share” is undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge of the expectations the legislators and legislative aides had regarding what District 95’s vote share would be in elections under Act 43 and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 249**

Admit that the legislators and legislative aides involved in drafting Act 43 intended for Assembly District 95 in Act 43 to have a high concentration of Democratic voters.

**RESPONSE:** The defendants object to the term “high concentration of Democratic voters” as undefined, vague, and ambiguous. The defendants are unable to admit or deny this request because they have no knowledge whether the legislators and legislative aides in drafting District 95 in Act 43 intended to have a high concentration of Democratic voters and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 250**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 95 in Act 43 was more likely to elect a Democratic than a Republican Representative to the Assembly.

**RESPONSE:** The defendants are unable to admit or deny this request because they have no knowledge of the legislators' and legislative aides' opinions on whether District 95 was more likely to elect a Republican than a Democratic Representative to the Assembly and cannot obtain such knowledge through reasonable inquiry. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 251**

Admit that it was possible to draw District 95 in Act 43 to include a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms "Republican vote share" and "likelihood of a Democratic Representative to the Assembly being elected" as undefined, vague, ambiguous, and calls for speculation. Given the ambiguity of these terms and the absence of any other criteria by which this hypothetical alternative district would be drawn and how it would fit into a statewide plan, the defendants are unable to admit or deny this request.

To the extent the request asks for an admission whether a district could be drawn without regard to any traditional districting principles and irrespective of how it would fit into a statewide plan, then the defendants admit that an infinite

number of districts could be drawn such that at least one would likely would have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have.

**Request for Admission No. 252**

Admit that the legislators and legislative aides involved in drafting Act 43 knew that Assembly District 95 in Act 43 could have a higher Republican vote share without affecting the likelihood of a Democratic Representative to the Assembly being elected.

**RESPONSE:** The defendants object that the terms “Republican vote share” and “likelihood of a Democratic Representative to the Assembly being elected” as undefined, vague, ambiguous, and calls for speculation. The defendants are unable to admit or deny this request because they have no knowledge of the legislators’ and legislative aides’ knowledge of whether District 95 could have a higher Republican vote share, whatever meaning that term may have, while not affecting the likelihood of a Democratic Representative to the Assembly being elected, whatever that meaning that term may have. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 253**

Admit that the Democratic candidate for State Assembly prevailed in Assembly District 95 in the 2012, 2014, 2016, and 2018 elections.

**RESPONSE:** Admit.

**Request for Admission No. 254**

Admit that Plaintiff William Whitford lives at 1047 Sherman Avenue, Madison, WI 53703, which is located in Assembly District 76 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 255**

Admit that Plaintiff William Whitford is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 256**

Admit that Plaintiff William Whitford is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Whitford usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 257**

Admit that Plaintiff William Whitford is a member of the Democratic Party of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 258**

Admit that Plaintiff Emily Bunting lives at 13625 Goose Creek Road, Viola, WI 54664, which is located in Assembly District 49 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 259**

Admit that Plaintiff Emily Bunting is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 260**

Admit that Plaintiff Emily Bunting is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Bunting usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 261**

Admit that Plaintiff Margaret Leslie DeMuth lives at N8016 County Road G, Lake Mills, WI 53551, which is located in Assembly District 38 in Act 43.



**RESPONSE:** Admit.

**Request for Admission No. 262**

Admit that Plaintiff Margaret Leslie DeMuth is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 263**

Admit that Plaintiff Margaret Leslie DeMuth is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that DeMuth usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 264**

Admit that Plaintiff Margaret Leslie DeMuth is a member of the Democratic Party of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 265**

Admit that Plaintiff Wayne Jensen lives at 400 W. Main Street,

Rochester, WI 53167, which is located in Assembly District 63 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 266**

Admit that Plaintiff Wayne Jensen is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 267**

Admit that Plaintiff Wayne Jensen is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Jensen usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 268**

Admit that Plaintiff Wayne Jensen is a member of the Racine County Democratic Party.

**RESPONSE:** Admit.

**Request for Admission No. 269**

Admit that Plaintiff Wendy Sue Johnson lives at 507 Indian Hills Drive, Eau Claire, WI 54703, which is located in Assembly District 68 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 270**

Admit that Plaintiff Wendy Sue Johnson is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 271**

Admit that Plaintiff Wendy Sue Johnson is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Johnson usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 272**

Admit that Plaintiff Wendy Sue Johnson is a member of the Democratic Party of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 273**

Admit that Plaintiff Wendy Sue Johnson ran as the Democratic candidate for State Assembly in Assembly District 68 in 2018.

**RESPONSE:** Admit.

**Request for Admission No. 274**

Admit that Plaintiff Ann E. Stevning-Roe lives at 209 S. Columbus Drive, Marshfield, WI 54449, which is located in Assembly District 69 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 275**

Admit that Plaintiff Ann E. Stevning-Roe is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 276**

Admit that Plaintiff Ann E. Stevning-Roe is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Stevning-Roe usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 277**

Admit that Plaintiff Ann E. Stevning-Roe is a member of the Democratic Party of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 278**

Admit that Plaintiff Donald Winter lives at 1555 Lyon Drive, Apt. 113, Neenah, WI 54956, which is located in Assembly District 55 in Act 43.

**RESPONSE:** Admit.

**Request for Admission No. 279**

Admit that Plaintiff Donald Winter is a qualified, registered voter in the State of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 280**

Admit that Plaintiff Donald Winter is a supporter of Democratic candidates and policies.

**RESPONSE:** The defendants object to the term “Democratic . . . policies” as undefined, vague, and ambiguous because not all Democrats agree on all policies. The defendants also object to the term “supporter of Democratic candidates” as vague and ambiguous because it does not indicate how often one must vote for Democratic candidates to be considered a “supporter” of them. As a result, the defendants can only admit that Winter usually votes for Democratic candidates and generally supports policies espoused by Democratic candidates and officeholders.

**Request for Admission No. 281**

Admit that Plaintiff Donald Winter is a member of the Democratic Party of Wisconsin.

**RESPONSE:** Admit.

**Request for Admission No. 282**

Admit that Trial Exhibit 284 contains the category “Statistical Pickup (Currently held DEM seats that move to 55% or better).”

**RESPONSE:** The defendants admit with the exception that the quoted language in Trial Exhibit 284 does not contain parentheses.

**Request for Admission No. 283**

Admit that Trial Exhibit 284 contains the category “GOP seats strengthened a lot (Currently held GOP seats that start at 55% or below that improve by at least 1%).”

**RESPONSE:** The defendants admit with the exception that the quoted language in Trial Exhibit 284 does not contain parentheses.

**Request for Admission No. 284**

Admit that Trial Exhibit 284 contains the category “GOP seats strengthened a little (Currently held GOP seats that start at 55% or below that improve less than 1%).”

**RESPONSE:** The defendants admit with the exception that the quoted language in Trial Exhibit 284 does not contain parentheses.

**Request for Admission No. 285**

Admit that Trial Exhibit 284 contains the category “GOP Donors to the Team (Incumbents with numbers above 55% that donate to the team).”

**RESPONSE:** The defendants admit with the exception that the quoted language in Trial Exhibit 284 does not contain parentheses.

**Request for Admission No. 286**

Admit that Trial Exhibit 284 contains the category “DEMS weakened (Currently held DEM seats (45% or better) that become more GOP).”

**RESPONSE:** The defendants admit with the exception that the quoted language in Trial Exhibit 284 does not contain parentheses.

**Request for Admission No. 287**

Admit that at least one of Act 43’s drafters categorized Assembly District 4 in Act 43 as a “GOP seat strengthened a little.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 288**

Admit that at least one of Act 43’s drafters categorized Assembly District 13 in Act 43 as a “Statistical Pick Up.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 289**

Admit that at least one of Act 43's drafters categorized Assembly District 21 in Act 43 as a "GOP seat strengthened a lot."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 290**

Admit that at least one of Act 43's drafters categorized Assembly District 22 in Act 43 as a "Statistical Pick Up."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 291**

Admit that at least one of Act 43's drafters categorized Assembly District 23 in Act 43 as a "GOP seat strengthened a lot."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.



**Request for Admission No. 292**

Admit that at least one of Act 43's drafters categorized Assembly District 25 in Act 43 as a "GOP seat strengthened a little."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 293**

Admit that at least one of Act 43's drafters categorized Assembly District 26 in Act 43 as a "GOP seat strengthened a lot."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 294**

Admit that at least one of Act 43's drafters categorized Assembly District 35 in Act 43 as a "GOP seat strengthened a little."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 295**

Admit that at least one of Act 43's drafters categorized Assembly District 42 in Act 43 as a "GOP seat strengthened a lot."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 296**

Admit that at least one of Act 43's drafters categorized Assembly District 49 in Act 43 as a "GOP seat strengthened a little."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 297**

Admit that at least one of Act 43's drafters categorized Assembly District 55 in Act 43 as a "GOP seat strengthened a lot."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. Subject to this objection, the defendants deny the request.

**Request for Admission No. 298**

Admit that at least one of Act 43's drafters categorized Assembly District 62 in Act 43 as a "Statistical Pick Up."

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 299**

Admit that at least one of Act 43’s drafters categorized Assembly District 68 in Act 43 as a “GOP seat strengthened a lot.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 300**

Admit that at least one of Act 43’s drafters categorized Assembly District 69 in Act 43 as a “GOP seat strengthened a little.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 301**

Admit that at least one of Act 43’s drafters categorized Assembly District 70 in Act 43 as “DEMS weakened.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 302**

Admit that at least one of Act 43’s drafters categorized Assembly District 86 in Act 43 as a “GOP seat strengthened a little.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 303**

Admit that at least one of Act 43’s drafters categorized Assembly District 88 in Act 43 as a “GOP seat strengthened a lot.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 304**

Admit that at least one of Act 43’s drafters categorized Assembly District 93 in Act 43 as a “GOP seat strengthened a lot.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 305**

Admit that at least one of Act 43’s drafters categorized Assembly District 94 in Act 43 as “DEMS weakened.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 306**

Admit that Dan Knodl was the incumbent Representative in Assembly District 24 as of November 2012.

**RESPONSE:** Admit.

**Request for Admission No. 307**

Admit that at least one of Act 43’s drafters categorized Dan Knodl as a “GOP Donor to the Team.”

**RESPONSE:** The defendants object that the phrase “at least one of Act 43’s drafters” is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 308**

Admit that Joel Kleefisch was the incumbent Representative in Assembly District 38 as of November 2012.

**RESPONSE:** Admit.

**Request for Admission No. 309**

Admit that at least one of Act 43's drafters categorized Joel Kleefisch as a "GOP Donor to the Team."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 310**

Admit that Robin Vos was the incumbent Representative in Assembly District 63 as of November 2012.

**RESPONSE:** Admit.

**Request for Admission No. 311**

Admit that at least one of Act 43's drafters categorized Robin Vos as a "GOP Donor to the Team."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 312**

Admit that Michelle Litjens was the incumbent Representative in Assembly District 56 as of November 2012.

**RESPONSE:** The defendants admit that Michelle Litjens was the Representative for Assembly District 56 in November 2012 but deny any implication that she ran for reelection in November 2012.

**Request for Admission No. 313**

Admit that at least one of Act 43's drafters categorized Michelle Litjens as a "GOP Donor to the Team."

**RESPONSE:** The defendants object that the phrase "at least one of Act 43's drafters" is vague and ambiguous and therefore cannot admit the request as drafted. The defendants could admit certain facts about the contents of Trial Exhibit 284, but this request goes beyond that trial exhibit.

**Request for Admission No. 314**

Admit that the documents provided to counsel for Defendants on an external hard drive accompanying a December 21, 2018 letter from counsel for Plaintiffs are genuine.

**RESPONSE:** The defendants cannot admit or deny this request because their counsel has never received the hard drive in question and has not been able to review the documents.

**Request for Admission No. 315**

Admit that when the legislators and legislative aides who drafted Act 43 were drawing the district lines, they did not have an overlay of highway routes visible on the computer screen.

**RESPONSE:** The defendants object to the terms “when the legislators and legislative aides who drafted Act 43 were drawing the district lines,” and “overlay of highway routes” as vague and ambiguous. The request does not specify how frequently this “overlay of highway routes” would need to be visible on the screen.

The defendants are unable to admit or deny this request because they do not know all of the various overlays or screens that were available in Autobound, the redistricting software used to draw Act 43. As a result, the defendants do not know whether a highway overlay was available to the drafters of Act 43 and, if so, whether they used it when drafting districts. The defendants reviewed trial and deposition testimony to see if this request could be admitted or denied.

**Request for Admission No. 316**

Admit that to create equally populous districts, it is not necessary for a mapmaker to follow the highway network.

**RESPONSE:** Admit.

Dated this 14th day of June, 2019.

Respectfully submitted,

JOSHUA L. KAUL  
Attorney General of Wisconsin



BRIAN P. KEENAN  
Assistant Attorney General  
State Bar #1056525



CLAYTON P. KAWSKI  
Assistant Attorney General  
State Bar #1066228

KARLA KECKHAVER  
Assistant Attorney General  
State Bar #1028242

Attorneys for Defendants

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-0020 (AAG Keenan)  
(608) 264-6365 (AAG Keckhaver)  
(608) 266-8549 (AAG Kawski)  
(608) 267-2223 (fax)  
*keenanbp@doj.state.wi.us*  
*keckhaverkz@doj.state.wi.us*  
*kawskicp@doj.state.wi.us*