The Honorable Robert S. Lasnik 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT TACOMA 9 SUSAN SOTO PALMER, et al., 10 NO. 3:22-cv-05035-RSL Plaintiffs, DEFENDANT SECRETARY OF STATE 11 STEVEN HOBBS'S RESPONSE TO 12 PLAINTIFFS' BRIEF IN SUPPORT OF v. REMEDIAL PROPOSALS STEVEN HOBBS, et al., 13 Defendants. 14 15 JOSE TREVINO, et al. Intervenor-Defendants. 16 17 Secretary Hobbs takes no position on whether to adopt any of Plaintiffs' proposed 18 remedial maps. Secretary Hobbs submits this brief for the purpose of providing information 19 about the proposals and defers to the Court regarding whether and how the information should 20 be utilized by the Court in selecting a remedial map. Specifically, this brief provides two pieces 21 of information regarding each remedial map: (1) the counties affected; and (2) the districts in 22 which incumbents would be displaced. This information was identified through an analysis 23 performed by the Office of the Secretary of State. Decl. of Nick Pharris. 24 25 26

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1	Plaintiffs' Remedial Proposal 1
2	Plaintiffs' first remedial proposal would affect 13 counties: Adams, Benton, Chelan,
3	Clark, Douglas, Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris
4	Decl., ¶ 5.
5	Plaintiffs' first remedial proposal would displace 8 incumbents in the following
6	positions, Pharris Decl., ¶ 7:
7	LD 8 Representative, Position 1
8	LD 12 Senator
9	LD 14 Representative, Position 1
10	LD 14 Representative, Position 2
11	LD 14 Senator
12	LD 15 Senator
13	LD 31 Representative, Position 1
14	LD 31 Senator
15	
16	Plaintiffs' Remedial Proposal 2
17	Plaintiffs' second remedial proposal would affect 11 counties: Adams, Benton, Clark,
18	Franklin, Grant, King, Klickitat, Lewis, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.
19	Plaintiffs' second remedial proposal would displace 5 incumbents in the following
20	positions, Pharris Decl., ¶ 8:
21	LD 8 Representative, Position 1
22	LD 14 Representative, Position 1
23	LD 14 Representative, Position 2
24	LD 14 Senator
25	LD 15 Senator
26	

1	Plaintiffs' Remedial Proposal 3
2	Plaintiffs' third remedial proposal would affect 12 counties: Adams, Benton, Chelan,
3	Clark, Douglas, Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris
4	Decl., ¶ 5.
5	Plaintiffs' third remedial proposal would displace 7 incumbents in the following
6	positions, Pharris Decl., ¶ 9:
7	LD 8 Representative, Position 1
8	LD 12 Senator
9	LD 14 Representative, Position 1
10	LD 14 Representative, Position 2
11	LD 14 Senator
12	LD 15 Senator
13	LD 31 Senator
14	
15	Plaintiffs' Remedial Proposal 4
16	Plaintiffs' fourth remedial proposal would affect 10 counties: Adams, Benton, Clark,
17	Franklin, Grant, King, Klickitat, Pierce, Thurston, and Yakima. Pharris Decl., ¶ 5.
18	Plaintiffs' fourth remedial proposal would displace 5 incumbents in the following
19	positions, Pharris Decl., ¶ 10:
- ^	positions, ritarns Deci., 10.
20	LD 8 Representative, Position 1
20	
	LD 8 Representative, Position 1
21	LD 8 Representative, Position 1 LD 14 Representative, Position 1
21 22	LD 8 Representative, Position 1 LD 14 Representative, Position 1 LD 14 Representative, Position 2
21 22 23	LD 8 Representative, Position 1 LD 14 Representative, Position 1 LD 14 Representative, Position 2 LD 14 Senator

1	Plaintiffs' Remedial Proposal 5
2	Plaintiffs' fifth remedial proposal would affect 3 counties: Benton, Klickitat, and
3	Yakima. Pharris Decl., ¶ 5.
4	Plaintiffs' fifth remedial proposal would displace 4 incumbents in the following
5	positions, Pharris Decl., ¶ 11:
6	LD 14 Representative, Position 1
7	LD 14 Representative, Position 2
8	LD 15 Representative, Position 1
9	LD 15 Representative, Position 2
10	
11	RESPECTFULLY SUBMITTED this 22nd day of December, 2023.
12	ROBERT W. FERGUSON Attorney General
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DECLARATION OF SERVICE 1 I hereby declare that on this day I caused the foregoing document to be electronically 2 filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of 3 this document upon all counsel of record. 4 DATED this 22nd day of December 2023, at Olympia, Washington. 5 6 s/Leena Vanderwood 7 Leena Vanderwood Paralegal 1125 Washington Street SE 8 PO Box 40100 9 Olympia, WA 98504-0100 $(360)^{1}753-6200$ Leena. Vanderwood@atg.wa.gov 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26