

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

NORTH CAROLINA LEAGUE OF
CONSERVATION VOTERS, INC., *et al.*,

Plaintiffs

and

COMMON CAUSE,
Plaintiff-Intervenor,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, *et al.*

Defendants.

Case No. 21 CVS 015426

REBECCA HARPER, *et al.*,

Plaintiffs

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting, *et al.*

Defendants.

Case No. 21 CVS 500085

**PLAINTIFF COMMON CAUSE'S OBJECTIONS TO
LEGISLATIVE DEFENDANTS' REMEDIAL MAPS**

Pursuant to Paragraph 9 of the North Carolina Supreme Court's February 4, 2021 Order and this Court's February 8, 2021 Order on the Submission of Remedial Plans, Common Cause herein submits its objections to the Legislative Defendants' Remedial Maps enacted by the General Assembly last week and submitted on February 18, 2022: S.L. 2022-3 (the "LD Congressional

Map”), S.L. 20222-2 (the “LD Senate Map”) and S.L. 2022-4 (the “LD House Map”). In support of its objections, Plaintiff Common Cause appends to this submission the expert report of Jonathan Mattingly and Gregory Herschlag (**Exhibit 1**, the “Mattingly Expert Report”), jointly designated with the *Harper* Plaintiffs, as well as an addendum to that report (**Exhibit 2**, the “Mattingly Addendum”), and the Second Affidavit of Christopher Ketchie (**Exhibit 3**, the “Second Ketchie Affidavit”).

The LD Remedial Maps are plainly unconstitutional when evaluated using the correct metrics using appropriate data, which differ significantly from the metrics scores, using manipulated and inaccurate data, submitted by the Legislative Defendants on February 18, 2022. Despite clear instruction from this Court and the North Carolina Supreme Court on the process and substantive requirements for constitutional remedial plans, the Legislative Defendants have failed once again to undertake the proper analysis required by *Stephenson* or consider all the appropriate factors to ensure equal voting power for voters, with the result of producing maps that fall short of the established Constitutional requirements. In their disclosures, Legislative Defendants blatantly disregarded clear direction from this Court on the required transparency for this process to provide “[t]he identity of all participants involved in the process of drawing the Proposed Remedial Plans submitted to the Court.” Feb. 8 Order on Submission of Remedial Plans ¶ 3(c). *See* LD Br. at 54 (failing to identify the “outside legal counsel, whose roles were restricted to providing legal advice” as having participated in the drawing process).¹ Legislative Defendants also provided a one-sided story of Senate negotiations that do not comport with contemporaneous

¹ To the extent that attorney client privilege protects the substance of that advice, it does not protect the disclosure of such counsel’s identity, nor does the Court’s order.

statements by other legislators,² and appear to have made no effort to incorporate public participation or the extensive public commentary received in the fall of 2021.

This lack of transparency is telling and reveals the same strategies of subterfuge and misdirection used by the Legislative Defendants this past fall to execute the extreme partisan gerrymanders already struck down by the North Carolina Supreme Court, right down to drawing maps through undisclosed legal counsel. *See* Dec. 29 Order on Mot. to Compel at 4–6. Legislative Defendants’ Remedial Maps thus deserve the same level of scrutiny as the 2021 Enacted Maps, and not the deference that maps produced in a fair and transparent process otherwise might.

Thankfully, the constitutional shortcomings of the Legislative Defendants Remedial Maps can be swiftly and easily remedied. For the LD House Map, the implementation of Common Cause’s proposed remedial House District 10, submitted on February 18, 2022, will bring this map into state Constitutional compliance, and prevent harmful vote dilution by altering just two districts within one county cluster, and thus not implicating the *Stephenson* rules at all. The LD Senate Map can similarly be brought within Constitutional bounds by the adoption of Common Cause’s remedial Senate District 4 and incorporating alternative cluster proposals from the remedial legislative process, as can the LD Congressional Map. Regardless of the approach taken by the Court in directing its Special Masters, it is abundantly clear that Legislative Defendants’ Remedial Maps cannot be accepted without modification.

² *See, e.g.,* See, e.g., Senator Dan Blue (@DanBlueNC), Twitter (Feb. 16, 2022, 2:28pm), <https://twitter.com/danbluenc/status/1494030901650640897?s=21> (“This process has not been collaborative, and it is clear to me that Senate Republicans had no real interest in finding a legislative solution.”); Senator Dan Blue (@DanBlueNC), Twitter (Feb. 17, 2022, 3:05pm), <https://twitter.com/danbluenc/status/1494402702775828481?s=21> (“The House compromise has made the stalemate in the Senate all the more disappointing. Senate Republicans appear to think they know better than the Supreme Court.”).

I. Objections to Legislative Defendants' Remedial Senate Map

The LD Senate Map constitutes an unlawful partisan gerrymander because it still diminishes and dilutes North Carolinians' voting power based on partisan affiliation by making it nearly impossible for voters who prefer one political party to elect a governing majority reflecting the will of the electorate. *See* NCSC Opinion ¶ 160. The North Carolina Supreme Court directed courts to compare the “relative chances of voters from each party electing a supermajority or majority of representatives under various possible electoral conditions,” *id.* at 161, which can be accomplished by examining the plausible number of representatives elections under various elections, as well as looking at the relative chances of election a majority or supermajority under various scenarios. The Supreme Court also noted “multiple reliable ways of demonstrating the existence of an unconstitutional partisan gerrymander” including “mean-median difference analysis[,] efficiency gap analysis[,] close-votes, close-seats analysis[,] and partisan symmetry analysis” which, in combination, may demonstrate “a significant likelihood that the districting plan will give the voters of all political parties substantially equal opportunity to translate votes into seats across the plan” to render it presumptively constitutional. *Id.* at ¶ 163. And while the Court gave some examples of thresholds, i.e., a mean-median difference of 1% or less using a “representative sample of past elections,” *id.* at ¶ 166, and an efficiency gap above 7% based upon prior federal case law, *id.* at ¶ 167, these were all characterized as “possible” metrics, *id.* at ¶ 164, with the overall objective of informing a determination of whether maps treat voters equally.

Legislative Defendants' submission ignores these instructions, losing the forest for the trees and instead relying predominantly on two metrics, using incomplete and skewed data, to support their proposed plans, mean-median difference and efficiency gap. For the LD Senate Plan, Legislative Defendants assert a mean-median of -0.65% and efficiency gap of -3.97%. *See* LD Br.

pp. 23-24. These scores are incorrect for reasons easily ascertained on the record. First, they are not based upon a “representative sample of past elections” but rather a much narrow set that Legislative Defendants appear to have hand-picked to render the statistics they wanted. Dr. Barber applied just 12 elections despite the more appropriate and broader set of elections that are publicly available, purportedly because these are the 12 elections used by Dr. Mattingly in his expert report during the merits phase. But Dr. Mattingly used the 12 elections to demonstrate the *cluster-level* bias, while using a broader set of 16 elections for his statewide analysis. *See* PX PX629 Mattingly Report at 11, 22 (using 16 elections to analyze statewide results for the House and Senate, respectively). In addition to this error, Legislative Defendants’ expert, Dr. Barber, confusingly appears to have collated votes across elections before performing his calculations, instead of the appropriate analysis of performing calculations on individual elections and averaging them.³

A look at the full set of relevant metrics for the Senate plan, calculated properly and using representative sets of elections, reveals the partisan skew of this map and why Legislative Defendants pursued the odd strategy they did:

Metric	Mattingly (Ex. 1)⁴	Additional Comparators⁵
Mean-Median	1.304%	2.2% R Source: PlanScore
Efficiency Gap	4.072%	4.8% R Source: PlanScore
Partisan Symmetry (Partisan Bias)	4.0125 seat bias	4.8% R Source: PlanScore

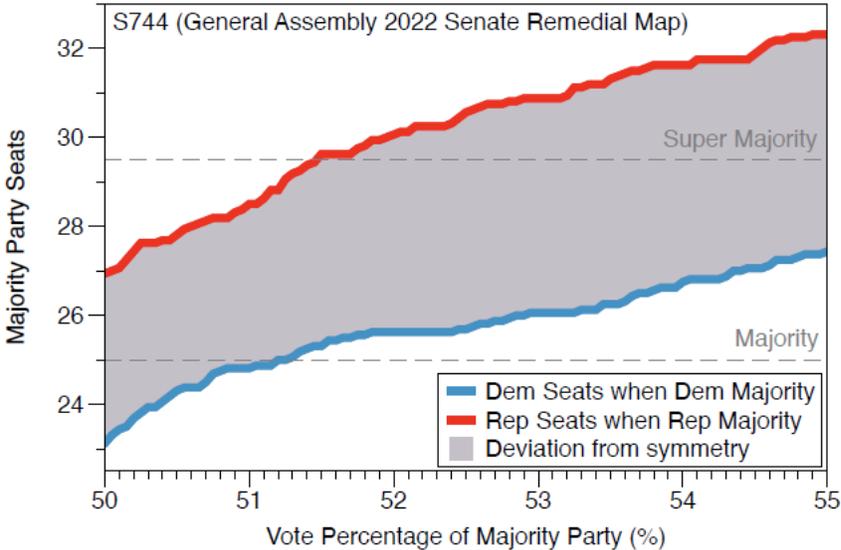
³ This error was explained in depth by Dr. Moon Duchin in the February 21, 2022 submission by Plaintiff NCLCV. *See* Second Duchin Rep. at 14.

⁴ Dr. Mattingly and Dr. Herschlag calculated their metrics using the results of sixteen recent statewide elections: *See* Ex. 1, Mattingly Expert Report p. 1. These Senate metric scores are reflected from Pages 6-7 of their report.

⁵ The source data and methodology for calculating these additional comparators is disclosed in the Second Ketchie Affidavit, and is all based upon publicly available information. *See* Ex. 3, Second Ketchie Aff. at ¶ 11.

<p>Plausible Number of Representatives Elected Comparison</p>	<p>29-30 R seats with 52% R vote share v. 25-26 D seats with 52% D vote share</p>	<p>22D-28R / 21D-29R Source: DRA Composite / PlanScore</p>
<p>Relative Chances of Electing Majority (26) or Supermajority (30)</p>	<p>R supermajority (or close) with 48 – 49% R votes D majority with 51-52% votes</p>	<p>R Majority: 4/6 Scenarios D Majority: 0/6 Scenarios R Supermajority: 1/6 Scenarios D Supermajority: 0/6 Scenarios Source: Second Ketchie Affidavit</p>

Figure 5.2 from the Mattingly Expert Report (Exhibit 1) shows just how asymmetrical the LD Senate Map is, as shown by the multi-seat gap in performance for each party based on voting percentage:



To bring the LD Senate Map within constitutional bounds, the Court should first implement the proposed remedial Senate District 4 proposed by Common Cause, which will improve the partisan bias in the map overall and prevent unlawful vote dilutions for voters of color, as supported in detail by Common Cause’s February 18, 2022 submission. In the interest of judicial

economy, those points will not be repeated here. However, Legislative Defendants made several erroneous assertions in their February 18, 2022 Brief that will be briefly addressed here.

First, Legislative Defendants erroneously contend that federal precedent, and in particular *Bartlett v. Strickland*, somehow prohibit the drawing of Common Cause’s proposed remedial districts because the proposed remedial districts contain less than 50% Black Voting Age Population. *See* LD Br. at 41. This is plainly not the case, as demonstrated by language in that decision expressly *sanctioning* these remedial districts. *Bartlett v. Strickland*, 556 U.S. 1, 23 (2009) (“[Section] 2 allows States to choose their own method of complying with the Voting Rights Act, and we have said that may include drawing crossover districts.”).

Second, Legislative Defendants try to argue their point by purposefully confusing the *Gingles I demonstrative* districts provided by Common Cause⁶ with the proposed *remedial* districts. This includes even excerpting the wrong figure at page 49 of their brief, and contending at page 51 that the Common Cause remedial Senate District 4 would reach into Pitt County when it would not. *See* Plaintiff Common Cause’s Proposed Remedial Districts at p. 14 Figure 4 (showing a proposed remedial Senate District 4 within Edgecombe, Wilson, and Wayne counties). Such misdirection cannot overcome the plain facts: all three *Gingles* criteria are satisfied in these geographic areas, as shown by figures 1 and 3 of Common Cause’s February 14 submission (which show a sufficient and geographically compact BVAP populations to constitute majorities in single-member districts) and the RPV studies in Exhibits 1 and 3 the Ketchie Affidavit appended to that submission (which show racially polarized voting in the 2021 Enacted Districts corresponding to these areas).⁷

⁶ *See* Figure 1 (HD10 *Gingles I* demonstrative) and Figure 3 (SD4 *Gingles I* demonstrative) in Plaintiff Common Cause’s Proposed Remedial Districts, February 18, 2022.

⁷ Legislative Defendants also asserted, without any support, that “To prove the presence of the third *Gingles* threshold condition, Common Cause is obligated to provide evidence of legally significant racially polarized

Instead of addressing the RPV studies provided by Plaintiff Common Cause, Legislative Defendants instead rely on the Lewis expert report from December 2021 that was performed using incomplete and insufficient statistical analysis,⁸ and which analyzes not whether legally-significant racially polarized voting exists, but rather whether Dr. Duchin's definition of "effective Black districts" was met anywhere in the Enacted Plans.⁹ Furthermore, Dr. Duchin confirmed at trial she never conducted a *Gingles* analysis at all, rendering Legislative Defendants' apparent reliance on her analysis inapposite. *See* T2 479:18–22 (Duchin) (Judge Shirley: "So you didn't do a *Gingles* analysis?") Dr. Duchin: "That's right.").

Legislative Defendants also submitted a supplemental Lewis expert report on February 18, 2022, that further shows Senate District 4 in the LD Senate Map has zero chance of electing a candidate of choice for Black voters. *See* Exhibit B to Lewis Supplemental Report at p. 4 (line "SCH22-4-004"). The supplemental Barber report submitted by Legislative Defendants on February 18, 2022 similarly shows that the BVAP level for the Senate district was intentionally reduced. *See* Barber Supplemental Report at 41 (at line "Fitch"). This proves the LD Senate Map destroys what was otherwise shown to be a functioning crossover district, providing yet another independent state law basis under the North Carolina Equal Protections Clause (Article I, Section

voting in a larger area of the state demonstrating that black voters in enacted HD10 and SD 4 could constitute a compact majority in a single member district but have been unable to elect their candidate of choice because they were submerged into a majority white districts." LD Br. at p. 48. In addition to having no support in the law, this runs contrary to direction from courts that the analysis must be district specific. *See Covington v. North Carolina*, 316 F.R.D. 117, 173 (M.D.N.C. 2016) (finding the General Assembly had failed to substantiate drawing purported VRA remedial districts because "none of the evidence Defendants have cited--without additional proof and district-specific analysis--can constitute a strong basis in evidence demonstrating that any of the challenged districts were reasonably necessary as drawn to avoid a Section 2 violation" where "evidence regarding *Gingles*' third factor in any particular district is sparse to non-existent."), *summarily aff'd*, 137 S. Ct. 2211 (2017); *id.* at 174 ("[W]hen drawing the challenged districts, Defendants made no district-specific assessment regarding the third *Gingles* factor (as properly understood).").

⁸ *See* Common Cause Appellant Br. at 72; Lewis Dep. Tr. 13:3–17:2 (stating that the analysis was done "on a highly-expedited timeline" and that "it would have been prohibitive" to do his normal analysis)

⁹ *See* LDTX109 Lewis Report at 5–7; *see also* Lewis Dep. Tr. 15:21–16:15 ("I don't have an opinion about, you know, what constitutes a level of racially polarized voting that would require some sort of action.")

19) for implementing the remedial Senate District 4 submitted by Common Cause. *Cf. Bartlett v. Strickland*, 556 U.S. at 24 (“[I]f there were a showing that a State intentionally drew district lines in order to destroy otherwise effective crossover districts, that would raise serious questions under both the Fourteenth and Fifteenth Amendments.”).

Finally, Legislative Defendants are wrong that Common Cause’s proposed remedial districts would be racial gerrymanders prohibited by *Shaw v. Reno*, 509 U.S. 63, 649 (1993) and *Alabama Legis. Black Caucus v. Alabama*, 575 U.S. 254 (2015). The remedial districts are narrowly tailored to adhere to traditional redistricting criteria and allow Black voters an equal opportunity to elect their candidates of choice, and were not drawn with race as a predominating factor. *Compare* February 18, 2022 Affidavit of Christopher Ketchie at ¶ 11 (“I also considered minimizing county splits and traversals, minimizing splits of community related boundaries such as municipalities and precincts, and maximizing compactness because I did not intend or want race to predominate in the drawing of these remedial district lines), *with Alabama Legis. Black Caucus*, 575 U.S. at 272 (“[A] plaintiff pursuing a racial gerrymandering claim must show that race was the predominant factor motivating the legislature’s decision to place significant number of voters within or without a particular district.” (internal quotation omitted)). Even if they were drawn with race as a predominating factor (which they were not), these remedial districts do not violate prohibitions on racial gerrymandering because they are narrowly tailored to serve several, independent, compelling government interests. *Alabama Legis. Black Caucus*, 575 U.S. at 272. The remedial Senate District 4 (and House District 10) prevent vote dilution for Black voters in violation of state Constitutional prohibitions and the Voting Rights Act, and are independently justified on each basis to bring the Senate map into Constitutional compliance with the prohibition on partisan gerrymandering.

In addition to incorporating the remedial Senate District 4 proposed by Common Cause, the Court should direct its Special Masters to bring the LD Senate Map into Constitutional compliance by modifying the same county cluster groupings that Legislative Defendants themselves acknowledged had Republican support and should be modified during the legislative process, *see* Ex. 1 at email from Sen. Paul Newton (Wake/Granville, Mecklenburg/Iredell, and New Hanover Counties), and those that were otherwise considered during the legislative process (Cumberland, Guilford, Forsyth, and Buncombe). These cluster options are further appropriate for modification because all but one were found to be partisan outliers by this Court, *see* Judgment ¶¶ 241–46 (Wake/Granville); 283–92 (Mecklenburg/Iredell); 249–56 (Cumberland); 259–67 (Guilford); 270–80 (Forsyth); 303–08 (Buncombe), and were the focus of public commentary requesting fair districts that keep communities of interest whole.

A map that incorporates Common Cause’s Remedial Senate District 2 and the alternative proposed clusters that were tabled during the legislative process would likely comport with constitutional requirements with a mean-median difference of -0.2%, efficiency gap of 1.0%, and Partisan Symmetry of -0.7%. *See* Ex. 3, Second Ketchie Affidavit ¶ 21. Plaintiff Common Cause understands the other Plaintiffs in this matter have proposed alternative Senate maps that may present viable options. Regardless of how the Court chooses to direct the Special Masters in ensuring a constitutional Senate map, the LD Senate Map cannot be approved or implemented in its current form.

II. Objections to the LD Remedial State House Map

The LD House Map also falls short of constitutional standards, but can be brought within constitutional bounds by implementing the proposed House District 10 submitted by Common Cause on February 18, 2022.

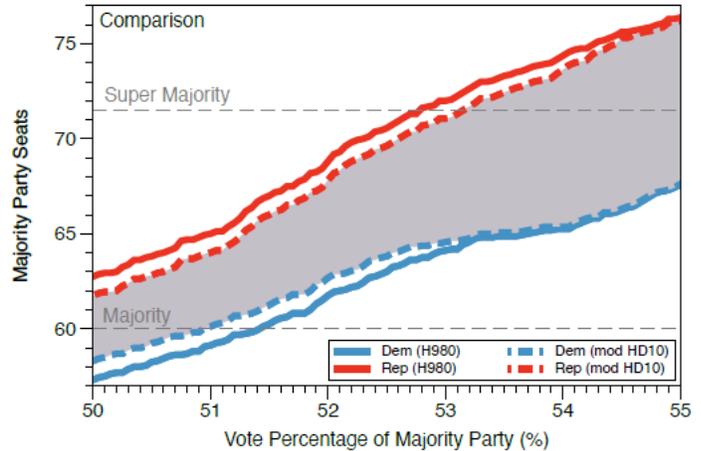
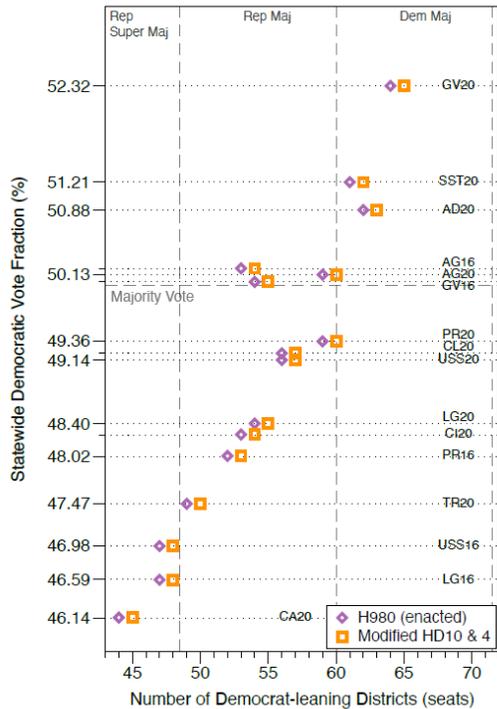
As with the Senate map, Legislative Defendants’ asserted efficiency gap of -0.84% and mean-median of -.7%, *see* LD Br. at 15, are incorrect. Instead, the appropriate data used in these metrics show that this map, although less skewed on partisan grounds, is too biased to pass Constitutional muster:

Metric	Mattingly Rep. (Ex. 1)¹⁰	Additional Comparators¹¹
Mean-Median	1.45%	1.4% R Source: PlanScore
Efficiency Gap	3.23%	3.0% R Source: PlanScore
Partisan Symmetry (Partisan Bias)	1.575 seat average deviation	2.9% R Source: PlanScore
Plausible Number of Representatives Elected Comparison	6.59375 seats average deviation	57D-63R / 58D-62R Source: DRA Composite / PlanScore
Relative Chances of Electing Majority (61) or Supermajority (72)	<i>See Figure below</i>	R Majority: 4/6 Scenarios D Majority: 1/6 Scenarios R Supermajority: 1/6 Scenarios D Supermajority: 0/6 Scenarios

These issues are remedied with the incorporation of the proposed House District 10 proposed by Common Cause on February 18, 2022. This modification consistently improves upon the partisan symmetry score of the enacted State House Map, as shown by Figures 2.1 and 2.2 one from the Mattingly Addendum (**Exhibit 2**):

¹⁰ Dr. Mattingly and Dr. Herschlag calculated their metrics using the results of sixteen recent statewide elections: *See* Ex. 1, Mattingly Expert Report at p. 1. These metrics and their analysis of the LD Congressional Map can be found at pages 3-5 of their report.

¹¹ The source data and methodology for calculating these additional comparators is disclosed in the Second Ketchie Affidavit, and is all based upon publicly available information. *See* Ex. 3, Second Ketchie Aff. at ¶ 18.



This modification significantly reduces the partisan bias of the LD House Map by consistently increasing the number of Democratic-leaning districts seats across an entire range of electoral potentials (left Figure 2.1) and bringing the symmetry of how Democratic-leaning and Republican-leaning voters are treated (right Figure 2.2). This modification also reduces the mean-median difference and efficiency gaps of the House map. *See Ex. 2, Mattingly Addendum at 2* (stating modified House map has a reduced mean-median difference of 1.01% and efficiency gap of 2.61%); *Ex. 3, Second Ketchie Aff. ¶ 22* (calculating mean-median difference of 1.2% R, efficiency gap of 2.6% R, and partisan Bias of 2.5% R).

Furthermore, as with the proposed remedial Senate District 4, the proposed remedial House District 10 would also prevent unlawful vote dilution, as supported by Plaintiff Common Cause’s February 18, 2022 submission and supporting materials. The supplemental Lewis expert submitted by Legislative Defendants further shows that House District 10 in the LD House Map has zero

chance of electing a candidate of choice for Black voters. *See* Exhibit B to Lewis Supplemental Report p. 1 (line “H980 Third Edition-010”). The supplemental Barber report submitted by Legislative Defendants on February 18, 2022 similarly shows that the BVAP level for this House district was intentionally reduced. *See* Barber Supplemental Report p. 30 (at line “Smith, R.”).

The fact that Legislative Defendants agreed to remedy other House districts begs the question of why they still intentionally destroyed the functioning crossover district in House District 10 in the LD House Map without any legitimate explanation on the record, reinforcing the need for the remedial district proposed by Common Cause to comport with the North Carolina Equal Protections Clause. *Cf. Strickland*, 556 U.S. at 24 (“[I]f there were a showing that a State intentionally drew district lines in order to destroy otherwise effective crossover districts, that would raise serious questions under both the Fourteenth and Fifteenth Amendments.”).

III. Objections to Legislative Defendants’ Remedial Congressional Map

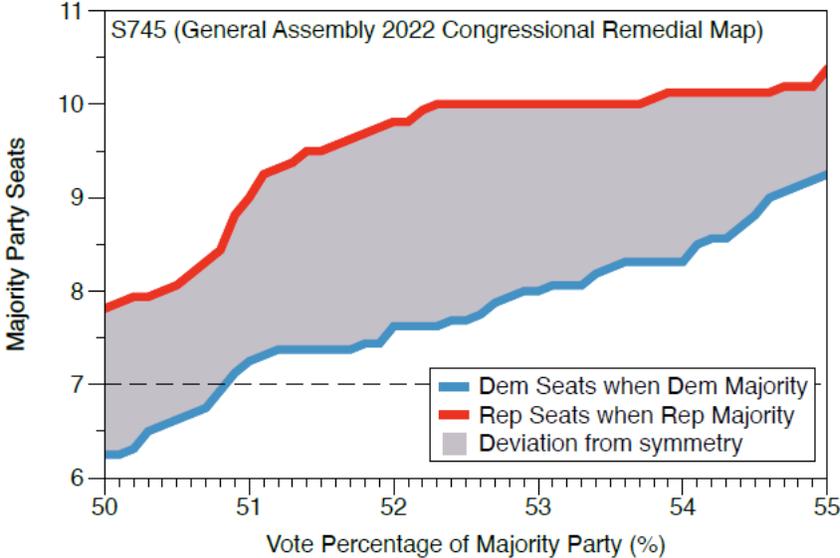
As with the Senate and House maps, the LD Congressional map does not comply with the Constitutional requirements against partisan gerrymandering and should not be adopted by this Court. Legislative Defendants again assert inaccurate median-mean (-0.61%) and efficiency gap (-5.29%) scores, *see* LD Br. at 27, which differ significantly with the scores on those metrics based upon an appropriate set of past electoral results:

Metric	Mattingly (Ex. 1)	Additional Comparators ¹²
Mean-Median	1.01%	1.1% R Source: PlanScore
Efficiency Gap	2.7180%	6.4% R Source: PlanScore
Partisan Symmetry (Partisan Bias)	1.575 seats	4.9% R Source: PlanScore

¹² *See* Ex. 3, Second Ketchie Affidavit ¶ 19.

Plausible Number of Representatives Elected Comparison	8-9 R seats with 51% R vote share v. 7-8 D seats with 51% D vote share	6D-8R / 4D-10R Source: DRA Composite / PlanScore
Relative Chances of Electing Majority (8)	See figure below	R Majority: 5/6 Scenarios D Majority: 1/6 Scenarios

Figure 4.2 from the Mattingly Report shows just how biased the LD Congressional Map is, as demonstrated by the lack of overlap and large seats-wide gap between how either party fairs depending on vote percentage:



If Legislative Defendants had examined just 20 random plans from the Mattingly ensemble, they would have had a 99.998% of finding a plan with greater partisan symmetry. Ex. 1, Mattingly Expert Report at p. 3.

Accordingly, the Court should direct its Special Masters to bring the LD Congressional Map into Constitutional compliance. The proposed alternative by Senator Chaudhry, which was

originally drawn and proposed during the 2021 legislative process,¹³ provides a viable Constitutional alternative that is grounded in the legislative record, with the exception of its split of Wake Forest University from the rest of the Triad. Senator Chaudhuri's proposed map would pair a significant part of the university community with the mountain counties in the northwestern part of the state in District 5, rather than keeping the entirety of the community of interest together with the Triad in District 6. Keeping Wake Forest University whole within the Triad-based Congressional district is important to ensure that the Congressional representative is responsive to the university's needs. Splitting university communities has occurred in North Carolina both frequently and recently,¹⁴ and North Carolina's university students have consistently called out this unfair practice.¹⁵

IV. Conclusion

The North Carolina Constitution guarantees the voters of the state the right to elect state and federal representatives under district plans that provide their votes with substantially equal voting power. NCSC Opinion ¶ 222. The Legislative Defendants' Remedial Maps fail to do so, and further fail to remedy unlawful vote dilution for voters of color. For the reasons provided above, the Legislative Defendants' Remedial Maps must not be implemented without modification, and instead the Court should select a plan that comports with the constitutional requirements.

¹³ We understand this is the Congressional remedial plan offered by the Harper Plaintiffs, originally filed as S.B. 738, and proposed and tabled during the legislative process for the 2021 Congressional Map. *See* Bill Summary for S.B. 740 / S.L. 2021-174, <https://ncleg.gov/BillLookUp/2021/S740>, at entry for 11/2021 Senate showing "Amend Tabled A1", linking to <https://webservices.ncleg.gov/ViewBillDocument/2021/53325/1/S740-BD-NBC-9229>.

¹⁴ *See* Trial T3 867:23–869:3 (Rep. Hawkins) (discussing the East Carolina University split in the Enacted House Plan).

¹⁵ *See, e.g., Bryan Warner, NC A&T Students Speak Out on Campus Gerrymandering, Common Cause* (Mar. 22, 2016), <https://www.commoncause.org/north-carolina/democracy-wire/nc-at-students-speak-out-on-campus-gerrymandering/>.

Respectfully submitted, this the 21st day of February, 2022.



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