

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN (Little Rock) DIVISION**

**DR. JULIUS J. LARRY III, Individually §
And in his Official Capacity as Publisher –
The Little Rock Sun Community §
Newspaper; MARTHA DIXON;
DOROTHY JEFFERSON, Individually on §
behalf of all Other Similarly-situated
African Americans Residing in the First §
And Second Congressional Districts of
The State of Arkansas**

PLAINTIFFS,

VS.

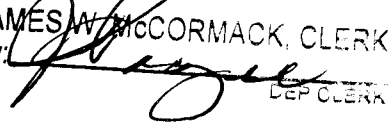
**STATE OF ARKANSAS; ASA §
HUTCHINSON, in his Official
Capacity as Governor of the State of §
Arkansas; LESLIE RUTLEDGE, in
her Official Capacity as Attorney §
General of the State of Arkansas; MARK §
MARTIN, in his Official Capacity as
Arkansas Secretary of State and the §
Arkansas Legislature, in their Official
Capacities §**

DEFENDANTS.

CASE NUMBER 4:18-cv-00116 KGB

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 15 2018

JAMES W. McCORMACK, CLERK
By:  DEP. CLERK

**PLAINTIFFS' SUPPLEMENTAL REQUEST FOR THREE JUDGE PANEL TO
CHALLENGE UNCONSTITUTIONALITY OF APPORTIONMENT OF SECOND
CONGRESSIONAL DISTRICT OF ARKANSAS PURSUANT TO 28 U.S.C. §2284 et seq.**

TO THE HONORABLE COURT:

Comes Now, Plaintiff, Dr. Julius J. Larry III, individually and in his official capacity as Publisher of the Little Rock Sun Community; Martha Dixon, and Dorothy Jefferson, individually and on behalf of all other similarly situated African Americans residing in the First and Second Congressional Districts of Arkansas as presently drawn, and files this their Supplemental Request for a Three Judge Panel to challenge the unconstitutional apportionment of the Second Congressional District along with the First Congressional District, as follows:

1. On February 9, 2018, Plaintiff, Dr. Julius J. Larry III presented the Plaintiffs' original Request for Three Judge Panel to the Chief District Judge Brian S. Miller in open court pursuant to 28 U.S.C. §2284, and the same is hereby incorporated by reference as if fully set out herein verbatim. Now, Plaintiffs, individually and on behalf of all other similarly situated African Americans of voting age residing in Congressional District 2, file this Supplemental Request for Three Judge Panel challenging the unconstitutionality of the apportionment of the Second Congressional District that has diluted the votes of African Americans for years.
2. Table 2 – Second Congressional District Results – 2010 below shows racial gerrymandering on its face. This is the same 2010 congressional election involving State Senator Joyce Elliott, who is referenced in the original Request for Three Judge Panel.

TABLE 2

U.S. Congressional District 2--- 2010



Joyce Elliott (D)



Tim Griffin (R)

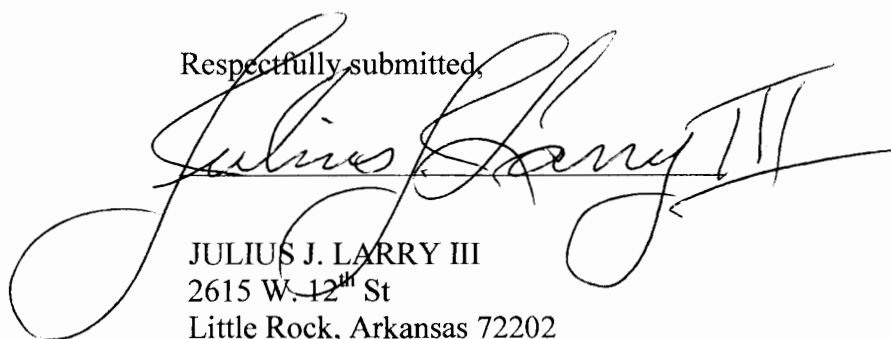
COUNTY	WINNER	Plaintiffs' Preferred Candidate	Percent Voting For Preferred Candidate	Votes Cast For Preferred Candidate	Percent Black Population
Conway	Republican	Democrat	38	2,318	11.2
Faulkner	Republican	Democrat	30	7,849	10.2
Perry	Republican	Democrat	28	1,957	1.9
Pulaski***	Democrat	Democrat	49	52,543	35
Saline	Republican	Democrat	24	8,301	4.7
Van Buren	Republican	Democrat	29	1,587	0.4

White	Republican	Democrat	23	4.468	4.0
Yell	Republican	Democrat	28	1,274	1.4

3. The Second Congressional District is prima facie evidence of Black vote dilution. Pulaski County must be combined with Jefferson County in order to form a majority-minority district along with the counties in the lower Arkansas Delta. Under the present congressional districting map, no African American will ever be elected to Congress.

WHEREFORE, Plaintiffs respectfully requests the Court to refer this Supplemental Request for Three Judge Panel along with the original Request for Three Judge Panel, to the Chief Judge of the Eighth Circuit, in accordance with 28 U.S.C §2284(b)1, and for such other relief, at law and in equity, such that Justice is served.

Respectfully submitted,



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