

Exhibit 54

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

O. JOHN BENISEK, *et al.*,

Plaintiffs,

v.

LINDA H. LAMONE., *et al.*,

Defendants.

Case No. 13-cv-3233

* * * * *

SECOND DECLARATION OF YAAKOV WEISSMANN

I, Yaakov Weissmann, under penalty of perjury, declare and state:

1. I, Yaakov “Jake” Weissmann, am over the age of eighteen and competent to testify on the matters stated below.

2. I have reviewed the July 10, 2017 Declaration of Professor Michael McDonald filed in this case as ECF 191-5. In that document, Professor McDonald draws conclusions from the dates of files produced to plaintiffs from my laptop and from the file names assigned to the files.

3. The dates of files produced to plaintiffs are not reflective of the date of last substantive change to the map. We would regularly send plans to the Department of Planning, the Department of Legislative Services, or others to obtain technical input. Cleaned up maps (correcting missing medians for example) would be uploaded in place of the old maps after the maps were received from these other State entities.

4. Other than the map described in paragraph 8 of my June 29, 2017 declaration, I do not remember receiving additional draft maps from the Congressional delegation or NCEC. The file names “Congressional Option 1” and “Congressional Option 2” were chosen by me to mark these draft maps as the main options to be considered by decisionmakers for the congressional plan. We were contemporaneously also drafting maps related to legislative districts, and I used these names to indicate that these were maps for the statewide congressional districts. I do not recall what particular

factors led me to choose these names for “Congressional Option 1” and “Congressional Option 2” compared with “111012 Group”, “111012 Group2”, and “111012 Group Zeroed Out,” other file names mentioned by Professor McDonald.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

8/1/17

Date

A handwritten signature in blue ink, appearing to read 'Yaakov Weissmann', written over a horizontal line.

Yaakov Weissmann