

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

Karen Davidson,	)	
Debbie Flitman,	)	
Eugene Perry,	)	
Sylvia Weber, and	)	
American Civil Liberties Union	)	
of Rhode Island, Inc.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	Civil Action No. 1:14-cv-00091-L-LDA
	)	
City of Cranston, Rhode Island	)	
	)	
Defendant.	)	

**STATEMENT OF DISPUTED FACTS**

In support of its Motion for Summary Judgment, Defendant submitted a Statement of Undisputed Facts. *See* Def.’s Mot. Summ. J. at 2-3. Pursuant to Local Rule LR Cv 56, as part of their Objection to Defendant’s Motion for Summary Judgment Plaintiffs hereby submit this Statement of Disputed Facts.

1. Not disputed.

2. Defendant asserts “The total population for Ward 6 used for redistricting purposes was 13,642.” Plaintiffs do not dispute that this population figure was used by the City in crafting its 2012 districting plan. Plaintiffs do dispute that this population figure was *properly* and *lawfully* used. Plaintiffs assert that the proper population count is 10,227. Cooper Suppl. Decl. Ex. C, Fig. 4 (Ex. 9).<sup>1</sup>

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<sup>1</sup> All Exhibits mentioned herein are annexed to the declaration of Sean J. Young, dated Aug. 6, 2015.

3. Defendant asserts “The total maximum deviation among the six city wards was less than ten (10) percent.” This is true only if the population of the Adult Correctional Institutions (ACI) is improperly counted as part of Ward 6’s population base. If the non-resident incarcerated persons incarcerated at the ACI are not counted in Ward 6, the total maximum population among the six city wards is 28.12%. Cooper Suppl. Decl. Ex. C ¶ 32 (Ex. 9).

DATED: August 6, 2015

Plaintiffs,

By their attorneys:

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**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

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