

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF  
ELECTIONS, *et al.*,

Defendants.

v.

VIRGINIA HOUSE OF DELEGATES,  
Intervenor-Defendants,

Defendants.

Civil Action No. 3:14-cv-00852-REP-AWA-BMK

**PARTIES' SUBMISSION REGARDING BVAP DATA**

By order dated January 10, 2019, the Court instructed the parties to “submit a chart setting out (in a form that permits easy comparison) for each challenged district and for each nonchallenged but affected district the census BVAP percentage and the DOJBVAP percentage as to the Enacted Plan, the Plaintiffs’ Plan A, the NAACP plan, and the Special Master's plans parties have consulted.” *See* Dkt. No. 346 at 11.

The parties have consulted and, through this submission by Plaintiffs, submit the requested data as Exhibit A to this filing. The attached Exhibit A sets out the requested BVAP calculations for any district altered in any of the specified proposals.<sup>1</sup> The parties shade the BVAP percentage of any district that is *not* altered from the enacted plan in a given proposal.

---

<sup>1</sup> In Exhibit A, the calculation the Court refers to as “Census BVAP percentage” is denoted as “DLS BVAP.”

The data in Exhibit A are voluminous and best viewed in native electronic format. In conjunction with this filing, Plaintiffs will serve the Court with a DVD containing Exhibit A in native Excel format.

Dated: January 15, 2019

By: /s/ Aria Branch

Marc Erik Elias (*pro hac vice*)  
Bruce V. Spiva (*pro hac vice*)  
Aria Branch (VSB No. 83682)  
**PERKINS COIE LLP**  
700 Thirteenth Street, N.W., Suite 600  
Washington, D.C. 20005-3960  
Telephone: 202.654.6338  
Facsimile: 202.654.9106  
Email: ABranch@perkinscoie.com  
Email: MElias@perkinscoie.com  
Email: BSpiva@perkinscoie.com

Kevin J. Hamilton (*pro hac vice*)  
Abha Khanna (*pro hac vice*)  
Ryan Spear (*pro hac vice*)  
William B. Stafford (*pro hac vice*)  
**PERKINS COIE LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: KHamilton@perkinscoie.com  
Email: AKhanna@perkinscoie.com  
Email: BStafford@perkinscoie.com  
Email: RSpear@perkinscoie.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of January, 2019, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By */s/ Aria C. Branch* \_\_\_\_\_

Aria C. Branch (VSB #83682)

Perkins Coie LLP

700 13th St. N.W., Suite 600

Washington, D.C. 20005-3960

Phone: (202) 654-6338

Fax: (202) 654-9106

ABranch@perkinscoie.com

*Attorneys for Plaintiffs*