

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

_____)	
GLORIA PERSONHUBALLAH, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
JAMES B. ALCORN, et al.,)	Civil Action No.: 3:13-cv-678
)	
Defendants.)	
)	
_____)	

**INTERVENOR-DEFENDANTS’ NOTICE REGARDING
CANDIDATES TO SERVE AS SPECIAL MASTER**

Intervenor-Defendants submit this Notice Regarding Candidates To Serve As Special Master in response to the Court’s Order entered yesterday. See DE 207. Intervenor-Defendants understand the Order’s reference to “possible candidates for the position of Special Master,” *id.* ¶ 2, to refer to the candidates identified by the Court during the telephonic conference held on September 2, 2015. In light of the compressed response period provided in the Court’s Order, Intervenor-Defendants have not had sufficient time to identify other possible candidates or to perform due diligence on the qualifications, schedules, and availability of the candidates identified by the Court. Intervenor-Defendants nonetheless have some familiarity with certain of the candidates identified by the Court, and rank them in their order of preference for the following reasons.

1. Dr. Richard Engstrom, Duke University (formerly of the University of New Orleans): Dr. Richard Engstrom is universally regarded as a leading expert in redistricting and voting rights cases. Dr. Engstrom has testified as an expert witness in several cases on a broad

range of issues relating to redistricting, voting rights, and Section 5 of the Voting Rights Act.

While Dr. Engstrom has frequently testified in support of civil rights plaintiffs, he has not taken strong partisan or political positions and would be expected to discharge the duties of the Special Master in a fair and even-handed manner.

2. Dr. Ronald Weber, University of Wisconsin-Milwaukee: Dr. Weber is also universally regarded as a leading and highly experienced expert and has testified on a broad range of issues in redistricting and voting rights cases. Dr. Weber has not taken strong partisan or political positions and would be expected to discharge the duties of the Special Master in a fair and even-handed manner.

3. Dr. John Alford, Rice University: Dr. Alford is a respected expert in the area of redistricting and voting rights. He has assisted jurisdictions in drawing redistricting maps and has served as a voting rights expert or a statistical expert in cases arising under Section 2 and Section 5 of the Voting Rights Act. Dr. Alford would be expected to discharge the duties of the Special Master in a fair and even-handed manner.

4. Dr. Nathaniel Persily, Stanford University; Dr. Bruce Cain, Stanford University; Dr. Bernard Grofman, University of California-Irvine: Dr. Persily, Dr. Cain, and Dr. Grofman are all respected, experienced experts in redistricting, but Intervenor-Defendants have no particular knowledge about them beyond that.

5. Dr. Theodore Arrington, University of North Carolina-Charlotte; William Cooper: Intervenor-Defendants do not have sufficient experience or information regarding Dr. Arrington or Mr. Cooper to comment on their qualifications or suitability to serve as the Special Master.

6. Dr. Allan Lichtman, American University: Dr. Lichtman is a partisan Democrat who reflexively advocates Democratic interests in redistricting and voting rights cases. Dr.

Lichtman was a Democratic candidate for the U.S. Senate in Maryland in 2006. In light of Dr. Lichtman's strong partisan affiliation and advocacy, Intervenor-Defendants do not believe that he can discharge the duties of the Special Master in a fair and even-handed manner and therefore object to any appointment of Dr. Lichtman in this case.

Dated: September 4, 2015

Respectfully submitted,

/s/ Mark R. Lentz

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CERTIFICATE OF SERVICE

I certify that on September 4, 2015, a copy of the INTERVENOR-DEFENDANTS' NOTICE REGARDING CANDIDATES TO SERVE AS SPECIAL MASTER was filed electronically with the Clerk of Court using the ECF system, which will send notification to the following ECF participants:

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Dated: September 4, 2015

/s/ Mark R. Lentz _____
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