

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

WILLIAM WHITFORD, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-0421

GERALD NICHOL, *et al.*,

Defendants.

DECLARATION OF BRIAN P. KEENAN

I, Brian P. Keenan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of the attorneys representing Defendants in the above captioned action. I make this declaration based upon my personal knowledge and in support of the State Defendants' Motion for Summary Judgment.

2. Attached as Exhibit 100 is a true and correct copy of the deposition transcript of Kenneth Mayer.

3. Attached as Exhibit 101 is a true and correct copy of the deposition transcript of Simon Jackman.

4. Attached as Exhibit 102 is a true and correct copy of the Government Accountability Board's 2012 Fall General Election Results.

5. Attached as Exhibit 103 is a true and correct copy of the document marked as Exhibit 5 at the deposition of Kenneth Mayer.

6. Attached as Exhibit 104 is a true and correct copy of the document marked as exhibit 7 at the Mayer deposition.

7. Attached as Exhibit 105 is a true and correct copy of the document marked as exhibit 8 at the Mayer deposition.

8. Attached as Exhibit 106 is a true and correct copy of the GAB's 2014 Fall General Election Results.

9. Attached as exhibit 107 is a true and correct copy of the document marked as exhibit 10 at the Mayer deposition.

10. Attached as exhibit 108 is a true and correct copy of the GAB's 2008 Fall General Election Results.

11. Attached as exhibit 109 is a true and correct copy of the GAB's 2010 Fall General Election Results.

12. Attached as exhibit 110 is a true and correct copy of the GAB's 2012 Recall Election Results.

13. Attached as exhibit 111 is a true and correct copy of the expert report of Kenneth Mayer. This report is identical to the one filed with the court on July 8, 2014 (Dkt. 1-2) except it contains an Annex that was referenced in, but not attached to, the version filed with the Court.

14. Attached as exhibit 112 is a true and correct copy of the article Jowei Chen and Jonathan Rodden, *Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures*, 57 *Quarterly Journal of Poli. Sci.* 239 (2013).

15. Attached as exhibit 113 is a true and correct copy of page 203 of the book by Michael J. Dubin, *Party Affiliations in the State Legislatures: A Year by Year Summary, 1796-2006*.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 4 day of January, 2016

/s/Brian P. Keenan
BRIAN P. KEENAN