

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

WILLIAM WHITFORD, ROGER ANCLAM,)
EMILY BUNTING, MARY LYNNE DONOHUE,)
HELEN HARRIS, WAYNE JENSEN,)
WENDY SUE JOHNSON, JANET MITCHELL,)
ALLISON SEATON, JAMES SEATON,)
JEROME WALLACE, and DONALD WINTER,)

No. 15-cv-421-bbc

Plaintiffs,)

v.)

GERALD C. NICHOL, THOMAS BARLAND,)
JOHN FRANKE, HAROLD V. FROEHLICH,)
KEVIN J. KENNEDY, ELSA LAMELAS, and)
TIMOTHY VOCKE,)

Defendants.)

DECLARATION OF PETER GUYON EARLE

I, Peter Guyon Earle, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

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

2. Attached as Exhibit A is a true and correct copy of the article Nicholas O. Stephanopoulos *Our Electoral Exceptionalism*, 80 U. Chi. L. Rev. 769 (2013).

3. Attached as Exhibit B is a true and correct copy of the article Ellen D. Katz et al., *Documenting Discrimination in Voting: Judicial Findings Under Section 2 of the Voting Rights Act*, 39 U. Mich. J.L. Reform 643 (2006).

4. Attached as Exhibit C is a true and correct copy of the article Jason Stein & Patrick Marley, *GOP Redistricting Maps Make Dramatic Changes*, Milwaukee Journal-Sentinel, July 8, 2011.

5. Attached as Exhibit D is a true and correct copy of the article Samuel Issacharoff, *Gerrymandering and Political Cartels*, 116 Harv. L. Rev. 593 (2002).

6. Attached as Exhibit E is a true and correct copy of the article Richard H. Pildes, *The Theory of Political Competition*, 85 Va. L. Rev. 1605 (1999).

7. Attached as Exhibit F is a true and correct copy of page 119 of Jason Stein & Patrick Marley, *More Than They Bargained For: Scott Walker, Unions, and the Fight for Wisconsin* (2013).

8. Attached as Exhibit G is a true and correct copy of a table relied on by defense expert Sean Trende to produce his expert report, called “dataset2.csv.”

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

Dated this 22nd day of January, 2016.

/s/ Peter Earle

PETER G. EARLE