

EXHIBIT 3

Exhibit 3

Exhibits Plaintiffs May Offer if the Need Arises

Plaintiffs reserve the right to:

1. Use any exhibits listed by Defendants.
2. Use all exhibits, papers, records, and writings provided by Defendants to Plaintiffs in this case and/or attached to pleadings, papers, motions or other filings in this case.
3. Use all exhibits, papers, records, or writings attached to, filed with, or referenced in Plaintiffs' prior filings in this case, including all spreadsheets or other documents on the DVD included with the Amended Mark Lanterman Declaration, dated March 18, 2016.
4. Use all expert witness reports, reliance material, and other materials generated in preparation for trial of this lawsuit.
5. Use any newly discovered evidence, records, reports, and exhibits.
6. Supplement and/or amend this Exhibit List.
7. Plaintiffs reserve any and all objections to any and all exhibits listed by Defendants.

Plaintiffs may offer if the need arises the exhibits listed below:

Exhibit No.	Description
369	Defendants' First Set of Requests for Admission and Interrogatories, dated February 24, 2016
370	Plaintiffs' Response to Defendants' First Set of Requests for Admission, dated March 25, 2016
371	Abramowitz, Alan I., Brad Alexander, and Matthew Gunning. 2006. "Don't Blame Redistricting for Uncompetitive Elections." <i>PS: Political Science and Politics</i> 39:87-90
372	Afshartous, David and Jan de Leeuw. 2005. "Predicting in Multilevel Models." <i>Journal of Educational and Behavioral Statistics</i> 30:109-139 (No. 2)
373	Ansolabehere, Stephen and James M. Snyder. 2012. "The Effects of Redistricting on Incumbents." <i>Election Law Journal</i> 11:490-502 (No. 4)
374	Ansolabehere, Stephen and James M. Snyder, and Charles Stewart, III. 2000. "Old Voters, New Voters, and the Personal Vote: Using Redistricting to Measure the Incumbency Advantage." <i>American Journal of Political Science</i> 44:17-34 (No. 1, January)

375	Ansolabehere, Stephen and James M. Snyder, and Charles Stewart, III. 2001. "Candidate Positioning in U.S. House Elections." <i>American Journal of Political Science</i> 45:136-159 (No. 1, January)
376	Campbell, James E. 1986. "Presidential Coattails and Midterm Losses in State Legislative Elections." <i>American Political Science Review</i> 80:45-63 (No. 1, March)
377	Glazier, Amihai, Bernard Grofman, and Marc Robbins. 1987. "Partisan and Incumbency Effects of 1970s Congressional Redistricting." <i>American Journal of Political Science</i> 31:680-707 (No. 3, August)
378	Greene, William H. 1990. <i>Econometric Analysis</i> . New York: MacMillan
379	Jacobson, Gary C. 2003. "Terror, Terrain, and Turnout: Explaining the 2002 Midterm Elections." <i>Political Science Quarterly</i> 118:1-22 (No. 1, Spring)
380	Jacobson, Gary C. 2009. <i>The Politics of Congressional Elections</i> , 7th edition. New York: Pearson Longman
381	King, Gary. 1996. "Why Context Should Not Count." <i>Political Geography</i> 15:159-163 (No. 2)
382	Levendusky, Matthew S., Jeremy C. Pope, and Simon D. Jackman. 2008. "Measuring-District Level Partisanship with Implications for the Analysis of U.S. Elections." <i>The Journal of Politics</i> 70:736-753 (No. 3, July)
383	McDonald, Michael P. 2006. "Drawing the Line on District Competition." <i>PS: Political Science and Politics</i> 39:99-104 (No 1, January)
384	McDonald, Michael P. 2014. "Presidential Vote Within State Legislative Districts." <i>State Politics & Policy Quarterly</i> 14:196-204 (No. 2)
385	Pavia, Jose M. and Antonio López-Quílez. 2013. "Spatial Vote Redistribution in Redrawn Polling Units." <i>Journal of the Royal Statistical Society A</i> 176: 655-678 (Series A, Part 3)
386	Wattenberg, Martin P., Ian McAllister, and Anthony Salvanto. 2000. "How Voting is Like Taking an SAT Test: An Analysis of American Voter Runoff." <i>American Politics Quarterly</i> 28:234-250 (No. 2, April)
387	Butler, David and Donald Stokes. 1974. <i>Political Change in Britain: The Evolution of Electoral Choice</i> . London: Macmillan
388	Edgeworth, F.Y. 1898. "Applications of the Theory of Probability." <i>Journal of the Royal Statistical Society</i> 51:534
389	Kendall, M. G. and A. Stuart. 1950. "The Law of Cubic Proportion in Election Results." <i>The British Journal of Sociology</i> 1(3):183-196
390	Niemi, Richard G. and Patrick Fett. 1986. "The Swing Ratio: An Explanation and an Assessment." <i>Legislative Studies Quarterly</i> 11:75-90
391	Niemi, Richard G. and Simon Jackman. 1991. "Bias and Responsiveness in State Legislative Districting." <i>Legislative Studies Quarterly</i> 16:183-202
392	Tufte, Edward R. 1973. "The Relationship Between Seats and Votes in Two-Party Systems." <i>American Political Science Review</i> 67:540-554
393	Altman, Micah and McDonald, Michael 2010, "The Promise and Perils of Computers in Redistricting." 2010. <i>Duke Journal of Constitutional Law & Public Policy</i> 5:69-111

394	Chen, Jowei and Jonathan Rodden. 2013. "Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures." <i>Quarterly Journal of Political Science</i> 8: 239-69
395	National Conference of State Legislators. September 29, 2009. <i>Redistricting Law 2010</i>
396	Bivand, Roger, and Gianfranco Piras. 2015. "Comparing Implementations of Estimation Methods for Spatial Econometrics." <i>Journal of Statistical Software</i> 63:1-36
397	Byers, Simon and Adrian E. Raftery. 1998. "Nearest-Neighbor Clutter Removal for Estimating Features in Spatial Point Processes." <i>Journal of the American Statistical Association</i> 93:577-584
398	Clark, Philip J. and Francis C. Evans. 1954. "Distance to Nearest Neighbor as a Measure of Spatial Relationships in Populations." <i>Ecology</i> 35:445-453
399	Dawkins, Casey J. 2007. "Space and the Measurement of Income Segregation." <i>Journal of Regional Science</i> 47:255-272
400	Iceland, John, and Daniel H. Weinberg. 2002. <i>Racial and Ethnic Residential Segregation in the United States: 1980-2000</i> . Census 2000 Special Reports, CENSR-3. August
401	Moore, Dale A. and Tim E. Carpenter. 1999. "Spatial Analytical Methods and Geographic Information Systems: Use in Health Research and Epidemiology." <i>Epidemiologic Reviews</i> 21:143-161
402	2000s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/redsum2000/redsum2000.htm#AL
403	1990s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/redout.htm
404	1980s Redistricting Case Summaries, National Conference of State Legislatures, http://www.senate.mn/departments/scr/redist/Redsum1980/redsum1980.htm
405	Michael McDonald & Robin Best, Unfair Partisan Gerrymanders in Politics and Law: A Diagnostic Applied to Six Cases, 14 Election Law Journal 312 (2015)
406	Eric McGhee, Measuring Efficient Partisan Bias (2016), prepared for the Annual Conference of the Midwest Political Science Association April 7-10, 2016.
407	John Nagle, How Competitive Should a Fair Single Member Districting Plan Be? (2016)
408	Samuel Wang, Three Tests for Practical Evaluation of Partisan Gerrymandering, 68 Stanford Law Review (2016)
409	Laughlin McDonald, The Looming 2010 Census: A Proposed Judicially Manageable Standard and Other Reform Options for Partisan Gerrymandering, 46 Harv J Legis 243 (2009)
410	Easha Anand, Finding a Path through the Political Thicket: In Defense of Partisan Gerrymandering's Justiciability, 102 Cal L Rev 917 (2014)
411	Brief of Amici Curiae Professors Gary King, Bernard Grofman, Andrew Gelman, and Jonathan N. Katz, in Support of Neither Party, League of United

	Latin American Citizens v. Perry, No. 05-204 (available on Westlaw at 2006 WL 53994)
412	Nicholas Stephanopoulos, Spatial Diversity, 125 Harv L Rev 1903 (2012)
413	Boris Shor and Nolan McCarty, The Ideological Mapping of American Legislatures, 105 Am Pol Sci Rev 530 (2011)
414	Andrew Gelman and Gary King, Enhancing Democracy through Legislative Redistricting, 88 Am Pol Sci Rev 541 (1994)
415	Gary King and Robert X. Browning, Democratic Representation and Partisan Bias in Congressional Elections, 81 Am Pol Sci Rev 1251 (1987)
416	Samuel Issacharoff, Pamela S. Karlan, and Richard H. Pildes, The Law of Democracy: Legal Structure of the Political Process (Thomson Reuters 4 th ed 2012)
417	Simon Jackman, Measuring Electoral Bias: Australia, 1949-93, 24 Brt J Pol Sci 319 (1994)
418	Nicholas Stephanopoulos, The Consequences of Consequentialist Criteria, 3 UC Irvine L Review 669 (2013)
419	Arden Rowell and Jessica Bregant, Numeracy and Legal Decision Making, 46 Ariz St L J 191 (2014)
420	Jeffrey A. Taylor, Paul S. Herrmson, and James M. Curry, The Impact of Multimember Districts on Legislative Effort and Success
421	Lani Guinier, Groups, Representation, and Race-Conscious Districting: A Case of the Emperor's Clothes, 71 Tex L Rev 1589 (1993)
422	Guillermo Owen and Bernard Grofman, Optimal Partisan Gerrymandering, 7 Pol Geography Q 5 (1988)
423	Jason Mercier, Proposed Constitutional Amendments Would Require Supermajority Vote for Tax Increases (Washington Policy Center, Feb 2013)
424	Janet Campagna and Bernard Grofman, Party Control and Partisan Bias in 1980s Congressional Redistricting, 52 J Politics 1242 (1990)
425	Gary W. Cox and Jonathan N. Katz, The Reapportionment Revolution and Bias in U.S. Congressional Elections, 43 Am J Pol Sci 812 (1999)
426	Christian R. Grose and Bruce I. Oppenheimer, The Iraq War, Partisanship, and Candidate Attributes: Variations in Partisan Swing in the 2006 U.S. House Elections, 32 Legis Stud Q 531 (2007)
427	Jenni Newton-Farrelly, Wrong Winner Election Outcomes in South Australia: Bias, Minor Parties and Non-uniform Swings (South Australian Parliament Research Library, Apr 1, 2010)
428	Adam B. Cox, Partisan Gerrymandering and Disaggregated Redistricting, 2004 S Ct Rev 409
429	John Sides and Eric McGhee, Redistricting Didn't Win Republicans the House (Wash Post Wonkblog, Feb 17, 2013)
430	Tony L. Hill, Electoral Bias and the Partisan Impact of Independent Redistricting Bodies: An Analysis Incorporating the Brookes Method (presented at the Annual Conference of the Midwest Political Science Association, Apr 2008)
431	Anthony J. McGann, Charles A. Smith, James A. Keena, Revenge of the Anti-federalists: Constitutional Implications of Redistricting (2014)

432	Andrew J. Taylor, <i>Elephant's Edge: The Republicans as a Ruling Party</i> (Praeger 2005)
433	David Epstein et al, <i>Estimating the Effect of Redistricting on Minority Substantive Representation</i> , 23 J L, Econ & Org 499 (2007)
434	Kevin A. Hill, <i>Does the Creation of Majority Black Districts Aid Republicans? An Analysis of the 1992 Congressional Elections in Eight Southern States</i> , 57 J Politics 384 (1995)
435	David Lublin and D. Stephen Voss, <i>Racial Redistricting and Realignment in Southern State Legislatures</i> , 44 Am J Pol Sci 792 (2000)
436	Jonathan Winburn, <i>The Realities of Redistricting: Following the Rules and Limiting Gerrymandering in State Legislative Redistricting</i> (Lexington 2008)
437	Todd Makse, <i>Defining Communities of Interest in Redistricting through Initiative Voting</i> , 11 Election L J 503 (2012)
438	Adam B. Cox and Richard T. Holden, <i>Reconsidering Racial and Partisan Gerrymandering</i> , 78 U Chi L Rev 553 (2011)
439	Jonathan Rodden, <i>The Geographic Distribution of Political Preferences</i> , 13 Ann Rev Pol Sci 321 (2010)
440	Altman, Micah. 2002. "A Bayesian Approach to Detecting Electoral Manipulation." <i>Political Geography</i> 21:39-48
441	Born, Richard. 1985. "Partisan Intentions and Election Day Realities in the Congressional Redistricting Process." <i>The American Political Science Review</i> 79 (2): 305-19
442	Brace, Kimball, Bernard Grofman, and Lisa Handley. 1987. "Does Redistricting Aimed to Help Blacks Necessarily Help Republicans?" <i>Journal of Politics</i> 49(1): 169-85
443	Brookes, Ralph Herbert. 1959. "Electoral Distortion in New Zealand." <i>The Australian Journal of Politics and History</i> 5: 218-23
444	Cain, Bruce E. 1984. <i>The Reapportionment Puzzle</i> . Berkeley: University of California Press
445	Campbell, James E. 1996. <i>Cheap Seats: The Democratic Party's Advantage in U.S. House Elections</i> . Columbus: The Ohio State University Press
446	Chen, Jowei and Jonathan Rodden. 2011. "Using Legislative Districting Simulations to Measure Electoral Bias in Legislatures." Presented at the annual meeting of the Midwest Political Science Association, Chicago
447	Engstrom, Erik J. 2006. "Stacking the States, Stacking the House: The Partisan Consequences of Congressional Redistricting in the 19 th Century." <i>American Political Science Review</i> 100 (03): 419-27
448	Erikson, Robert S. 1972. "Malapportionment, Gerrymandering, and Party Fortunes in Congressional Elections." <i>American Political Science Review</i> 66 (4): 1234-45
449	Gelman, Andrew, Gary King, and Andrew C. Thomas. 2008. "JudgeIt II: A Program for Evaluating Electoral Systems and Redistricting Plans."
450	Gilligan, Thomas W., and John G. Matsusaka. 1999. "Structural Constraints on Partisan Bias Under the Efficient Gerrymander." <i>Public Choice</i> 100: 65-84
451	Grofman, Bernard, William Koetzle, and Thomas Brunell. 1997. "An Integrated Perspective on the Three Potential Sources of Partisan Bias:

	Malapportionment, Turnout Differences, and the Geographic Distribution of Party Vote Shares.” <i>Electoral Studies</i> 16(4): 457-70
452	Kastellec, Jonathan P., Andrew Gelman, and Jamie P. Chandler. 2008. “The Playing Field Shifts: Predicting the Seats-Votes Curve in the 2008 U.S. House Elections.” <i>PS: Political Science & Politics</i> 41 (4): 729-32
453	Kousser, J. Morgan. 1996. “Estimating the Partisan Consequences of Redistricting Plans-Simply.” <i>Legislative Studies Quarterly</i> 21 (4): 521-41
454	McDonald, Michael P. 2004. “A Comparative Analysis of Redistricting Institutions in the United States, 2001-02.” <i>State Politics & Policy Quarterly</i> 4(4): 371-95
455	National Conference of State Legislatures Reapportionment Task Force. 1989. “Redistricting Provisions: 50 State Profiles.” Washington, DC: National Conference of State Legislatures
456	Niemi, Richard G. and John Deegan, Jr. 1978. “A Theory of Political Districting.” <i>The American Political Science Review</i> 72 (4): 1304-23
457	Shotts, Kenneth W. 2001. “The Effect of Majority-Minority Mandates on Partisan Gerrymandering.” <i>American Journal of Political Science</i> 45 (1):120-35
458	Soper, C.S. and Joan Rydon. 1958. “Under-Representation and Electoral Participation.” <i>The Australian Journal of Politics and History</i> 4 (1): 94-106
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460	Yoshinaka, Antoine, and Chad Murphy. 2009. “Partisan Gerrymandering and Population Instability: Completing the Redistricting Puzzle.” <i>Political Geography</i> 28: 451-62.