

**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. )

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**PLAINTIFFS' EXHIBIT LIST**

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In accordance with the Court's October 15, 2015 Scheduling Order (Dkt. 33) and Civil L.R. 16(c)(1), the parties, through their respective counsel, submit the following exhibit lists.

## Exhibits Plaintiffs Expect to Use

EXHIBIT (S) OF				
Plaintiffs (Indicate plaintiff or defendant)		<u>WILLIAM WHITFORD, et al.</u>  V. Case No. <u>15-cv-421-bbc</u>  <u>GERALD NICHOL, et al.</u>		
Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
	1		Illustrative Maps	
	2		Expert Report of Ken Mayer, dated July 3, 2015	
	3		Expert Report of Ken Mayer, Mayer Regression Model	
	4		Expert Report of Ken Mayer, Figure 1	
	5		Expert Report of Ken Mayer, Figure 2	
	6		Expert Report of Ken Mayer, Figure 3	
	7		Expert Report of Ken Mayer, Figure 4	
	8		Expert Report of Ken Mayer, Figure 5	
	9		Expert Report of Ken Mayer, Figure 6	
	10		Expert Report of Ken Mayer, Figure 7	
	11		Expert Report of Ken Mayer, Figure 8	
	12		Expert Report of Ken Mayer, Figure 9	
	13		Expert Report of Ken Mayer, Figure 10	
	14		Expert Report of Ken Mayer, Figure 11	
	15		Expert Report of Ken Mayer, Figure 12	
	16		Expert Report of Ken Mayer, Figure 13	
	17		Expert Report of Ken Mayer, Figure 14	
	18		Expert Report of Ken Mayer, Table 1	
	19		Expert Report of Ken Mayer, Table 2	
	20		Expert Report of Ken Mayer, Table 3	
	21		Expert Report of Ken Mayer, Table 4	
	22		Expert Report of Ken Mayer, Table 5	
	23		Expert Report of Ken Mayer, Table 6	
	24		Expert Report of Ken Mayer, Table 7	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	25		Expert Report of Ken Mayer, Table 8	
	26		Expert Report of Ken Mayer, Table 9	
	27		Expert Report of Ken Mayer, Table 10	
	28		Expert Report of Ken Mayer, Annex Table, Differences Between GAB reports and LTSB data	
	29		Expert Report of Ken Mayer, Annex Table, Allocation of Reporting Unit Data to Ward Data	
	30		Expert Report of Ken Mayer, Annex Table, Independent Variable: Assembly Republican Vote Totals	
	31		Expert Report of Ken Mayer, Annex Table, Independent Variable: Assembly Democratic Vote Totals	
	32		Expert Report of Ken Mayer, Annex Table, Population Deviation	
	33		Expert Report of Ken Mayer, Annex Table, Compactness	
	34		Expert Report of Simon Jackman, dated July 7, 2015	
	35		Expert Report of Simon Jackman, Figure 1	
	36		Expert Report of Simon Jackman, Figure 2	
	37		Expert Report of Simon Jackman, Figure 3	
	38		Expert Report of Simon Jackman, Figure 4	
	39		Expert Report of Simon Jackman, Figure 5	
	40		Expert Report of Simon Jackman, Figure 6	
	41		Expert Report of Simon Jackman, Figure 7	
	42		Expert Report of Simon Jackman, Figure 8	

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	No.	Witness		Rulings, Exceptions
	43		Expert Report of Simon Jackman, Figure 9	
	44		Expert Report of Simon Jackman, Figure 10	
	45		Expert Report of Simon Jackman, Figure 11	
	46		Expert Report of Simon Jackman, Figure 12	
	47		Expert Report of Simon Jackman, Figure 13	
	48		Expert Report of Simon Jackman, Figure 14	
	49		Expert Report of Simon Jackman, Figure 15	
	50		Expert Report of Simon Jackman, Figure 16	
	51		Expert Report of Simon Jackman, Figure 17	
	52		Expert Report of Simon Jackman, Figure 18	
	53		Expert Report of Simon Jackman, Figure 19	
	54		Expert Report of Simon Jackman, Figure 20	
	55		Expert Report of Simon Jackman, Figure 21	
	56		Expert Report of Simon Jackman, Figure 22	
	57		Expert Report of Simon Jackman, Figure 23	
	58		Expert Report of Simon Jackman, Figure 24	
	59		Expert Report of Simon Jackman, Figure 25	
	60		Expert Report of Simon Jackman, Figure 26	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	61		Expert Report of Simon Jackman, Figure 27	
	62		Expert Report of Simon Jackman, Figure 28	
	63		Expert Report of Simon Jackman, Figure 29	
	64		Expert Report of Simon Jackman, Figure 30	
	65		Expert Report of Simon Jackman, Figure 31	
	66		Expert Report of Simon Jackman, Figure 32	
	67		Expert Report of Simon Jackman, Figure 33	
	68		Expert Report of Simon Jackman, Figure 34	
	69		Expert Report of Simon Jackman, Figure 35	
	70		Expert Report of Simon Jackman, Figure 36	
	71		Expert Report of Simon Jackman, Table 1	
	72		Secrecy Agreements by Republican Legislators	
	73		Defendants' Amended Answer, dated January 15, 2016	
	74		Nicholas Stephanopoulos, Our Electoral Exceptionalism (2013) article	Objection: hearsay
	75		Ellen Katz, Documenting Discrimination in Voting-Judicial Findings Under Section 2 (2005) article (Part 1 of 2)	Objection: hearsay
	76		Ellen Katz, Documenting Discrimination in Voting- Judicial Findings Under Section 2 (2005) article (Part 2 of 2)	Objection: hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	77		Jacob Stein & Patrick Marley, GOP Redistricting Maps Make Dramatic Changes, July 8, 2011	Objection: hearsay
	78		Samuel Issacharoff, Gerrymandering and Political Cartels (2002) article	Objection: hearsay
	79		Richard Pildes, The Theory of Political Competition (1999) article	Objection: hearsay
	80		WITHDRAWN	Objection: hearsay
	81		Trende dataset2.csv	
	82		Curriculum Vitae of Dr. Simon Jackman	
	83		Expert Rebuttal Report of Simon Jackman, dated December 21, 2015	
	84		Expert Rebuttal Report of Simon Jackman, Figure 1	
	85		Expert Rebuttal Report of Simon Jackman, Figure 2	
	86		Expert Rebuttal Report of Simon Jackman, Figure 3	
	87		Expert Rebuttal Report of Simon Jackman, Figure 4	
	88		Expert Rebuttal Report of Simon Jackman, Figure 5	
	89		Expert Rebuttal Report of Simon Jackman, Figure 6	
	90		Expert Rebuttal Report of Simon Jackman, Figure 7	
	91		Expert Rebuttal Report of Simon Jackman, Figure 8	
	92		Expert Rebuttal Report of Simon Jackman, Figure 9	
	93		Jackman Sensitivity Testing Reliance Material	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	94		Jackman Sensitivity Testing Reliance Material, Figure 1	
	95		Jackman Sensitivity Testing Reliance Material, Figure 2	
	96		Excerpted Carl Klarner Data	
	97		Party Control Data	
	98		Eric McGhee, Measuring Partisan Bias in Single-Member District Electoral Systems (2014) article	Objection: hearsay
	99		Fifield et al, A New Automated Redistricting Simulator Using Markov Chain Monte Carlo (2015) article	Objection: hearsay
	100		Andrew Gelman and Gary King, Estimating the Electoral Consequences of Legislative Redistricting (1990) article	Objection: hearsay
	101		Gary Cox and Jonathan Katz, Elbridge Gerry's Salamander (2002) book excerpt	Objection: hearsay
	102		Bruce Cain, Assessing the Partisan Effects of Redistricting (1985) article	Objection: hearsay
	103		Curriculum Vitae of Dr. Kenneth Mayer	
	104		Expert Rebuttal Report of Kenneth Mayer, dated December 21, 2015	
	105		Expert Rebuttal Report of Kenneth Mayer, Figure A	
	106		Expert Rebuttal Report of Kenneth Mayer, Figure B	
	107		Expert Rebuttal Report of Kenneth Mayer, Figure C	
	108		Expert Rebuttal Report of Kenneth Mayer, Figure D	
	109		Expert Rebuttal Report of Kenneth Mayer, Table A	
	110		Expert Rebuttal Report of Kenneth Mayer, Table B	

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	No.	Witness		Rulings, Exceptions
	111		Expert Rebuttal Report of Kenneth Mayer, Table C	
	112		Expert Rebuttal Report of Kenneth Mayer, Table D	
	113		Expert Rebuttal Report of Kenneth Mayer, Table E	
	114		Amended Expert Rebuttal Report of Kenneth Mayer, dated March 31, 2016	Objection: untimely under pretrial order and w/o leave of court
	115		Amended Expert Rebuttal Report of Kenneth Mayer, Figure E	Objection: untimely under pretrial order and w/o leave of court
	116		Amended Expert Rebuttal Report of Kenneth Mayer, Table F	Objection: untimely under pretrial order and w/o leave of court
	117		Amended Expert Rebuttal Report of Kenneth Mayer, Table G	Objection: untimely and w/o leave of court
	118		Edward Glaeser & Bryce Ward, Myths and Realities of American Political Geography (2005) article	Objection: hearsay
	119		Edward Glaeser and Jacob Vigdor, The End of the Segregated Century (2012) article	Objection: hearsay
	120		Su-Yuel Chung & Lawrence Brown, Racial/Ethnic Sorting in Spatial Context: Testing the Explanatory Frameworks (2007) article	Objection: hearsay
	121		Glaeser & Ward Isolation Index Chart	Objection: hearsay
	122		Chart with Average Efficiency Gaps for Wisconsin Plans 1970s-2010s	Reserve right to object
	123		Chart with Democratic and Republican Isolation and Clustering Scores 2004-2014	Reserve right to object



Date	Identification		Description	Offers, Objections,
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	124		Chart with Breakdown of Efficiency Gap and Party Control – Historical and Current	Reserve right to object
	125		Chart with Efficiency Gap Calculations for Elections Where All Races Contested	Objection: beyond scope of Prof. Jackman's report
	126		Declaration of Sean Trende, dated December 2, 2015	
	127		Curriculum Vitae of Sean Trende	
	128		Transcript of Sean Trende deposition, dated December 14, 2015	
	129		Subpoena for Sean Trende to appear at deposition, dated December 7, 2015	
	130		Transcript of Nicholas Goedert deposition, dated December 15, 2015	
	131		Fryer & Holden, Measuring the Compactness of Political Districting Plans (2011) article	Objection: hearsay
	132		Nicholas Goedert, Gerrymandering or Geography? How Democrats Won the Popular Vote But Lost the Congress (2012) article	
	133		Nicholas Goedert, The Case of Disappearing Bias: A 2014 Update to the Gerrymandering or Geography (2015)	
	134		Keith Gaddie April 17, 2011 Memo (Wisconsin_Partisanship.docx)	
	135		Subpoena for Nicholas Goedert to appear at deposition, dated December 7, 2015	
	136		Expert Report of Nicholas Goedert	
	137		Curriculum Vitae of Nicholas Goedert	
	138		Plaintiffs' Complaint, dated July 8, 2015	Objection: hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	139		Goedert Calculations from Math Exercise During Deposition, dated December 15, 2015	
	140		Nicholas Goedert, Redistricting, Risk, and Representation (2014) article	
	141		Nicholas Stephanopoulos & Eric McGhee, Partisan Gerrymandering and the Efficiency Gap (2015) article	Objection: hearsay
	142		“Media” section from Goedert’s academic home page	Objection: hearsay
	143		Vox article, “What is gerrymandering”	Objection: hearsay
	144		Vox article, “How does gerrymandering work?”	Objection: hearsay
	145		Vox article, “How gerrymandering is important to Republican control of the house”	Objection: hearsay
	146		Smith & Venables, Introduction to R (2015) article	Objection: hearsay
	147		Sean Trende’s “Wisconsin_clustering_computation.R” file	
	148		Andrew Gelman & Gary King, Unified Method of Evaluating Electoral Systems and Redistricting Plans (1994) article	Objection: hearsay
	149		Friedman & Holden, Optimal Gerrymandering: Sometimes Pack, but Never Crack (2008) article	Objection: hearsay
	150		Luc Anselin, Local Indicators of Spatial Association – LISA (1995) article	Objection: hearsay
	151		Tam Cho, Contagion Effects and Ethnic Contribution Networks (2003) article	Objection: hearsay
	152		Reardon & O’Sullivan, Measures of Spatial Segregation (2004) article	Objection: hearsay
	153		Denton & Massey, Hypersegregation in U.S. Metropolitan Areas: Black and Hispanic Segregation Along Five Dimensions (1989) article	Objection: hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	154		Jowei Chen Amended Proposed Amicus Brief	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	155		Jowei Chen Wisconsin Analysis filed with Proposed Amicus Brief	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	156		Jowei Chen Wisconsin Act 43 Analysis, publicly available at <a href="http://www.umich.edu/~jowei/Wisconsin_Act_43_Analysis.pdf">http://www.umich.edu/~jowei/Wisconsin_Act_43_Analysis.pdf</a>	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	157		Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 2	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	158		Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 3	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	159		Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 4	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports

Date	Identification		Description	Offers, Objections,
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	160		Jowei Chen Wisconsin Act 43 Analysis, publicly available, Figure 7	Objections: hearsay, relevance, untimely expert testimony, excluded by court order, and outside scope of experts' reports
	161		Transcript of Dr. Ronald Keith Gaddie deposition, dated March 9, 2016	
	162		Video deposition of Dr. Ronald Keith Gaddie, dated March 9, 2016	
	163		Notice of Videotaped Deposition to Dr. Gaddie	
	164		Green Lexar Flash Drive (produced by Gaddie at his March 9, 2016 deposition)	
	165		Transcript of Dr. Gaddie deposition from January 20, 2012 ( <i>Baldus</i> litigation)	
	166		Video deposition of Dr. Ronald Keith Gaddie, dated January 20, 2012	
	167		Transcript of <i>Baldus</i> trial	
	168		Flash drive marked in <i>Baldus</i> as Ex. 57, produced by Dr. Gaddie January 20, 2012	
	169		Dr. Gaddie's engagement/retention letter, dated April 11, 2011	
	170		Flash drive produced at March 9, 2016 deposition of Dr. Gaddie with files recovered by Mark Lanterman from external hard drives	
	171		Photo of three hard drives	
	172		Plan comparisons spreadsheet (Plancomparisons.xlsm)	
	173		Milwaukee_Gaddie_4_16_11_v1_B , Ex. 72 in <i>Baldus</i> January 20, 2012 deposition of Dr. Gaddie	
	174		Milwaukee_Gaddie_4_16_11_v1_B	

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	175		Email string between Dr. Gaddie and Joe Handrick, Tad Ottman & Adam Foltz cced, dated April 20, 2011	
	176		Team Map chart (from Plan Comparisons.xlsm spreadsheet)	
	177		Partial version of Joint Final Pretrial Report ( <i>Baldus</i> litigation)	
	178		Exhibit A to Joint Final Pretrial Report ( <i>Baldus</i> litigation)	
	179		Transcript from Jeff Ylvisaker deposition, dated March 11, 2016	
	180		30(b)(6) Subpoena sent to the Wisconsin Legislative Technology Services Bureau, dated February 12, 2016	
	181		Video deposition of Jeff Ylvisaker, dated April 29, 2013	
	182		Transcript of Jeff Ylvisaker deposition ( <i>Baldus</i> case), dated April 29, 2013	
	183		Email from Peter Earle to Eric McLeod re: evidence preservation, dated April 10, 2012	Objection: hearsay and relevance
	184		Chart created by Jeff Ylvisaker, tracking Foltz/Ottman computers (exhibit 2 in Ylvisaker April 29, 2013 <i>Baldus</i> deposition)	
	185		LTSB configuration item dated February 18, 2016	
	186		Privilege log regarding LTSB decommissioning of redistricting computers, dated March 2016	
	187		<i>Baldus</i> 30(b)(6) subpoenas with work orders and configuration documents, dated April 2013	
	188		WRK32586 Responsive Spreadsheets File Detail Report.xlsx	

Date	Identification		Description	Offers, Objections,
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	189		WRK32586 External HD Responsive Spreadsheets File Detail Report.xlsx	
	190		WRK32587 Responsive Spreadsheets File Detail Report.xlsx	
	191		Transcript of Adam Foltz deposition, dated March 31, 2016	
	192		Video deposition of Adam Foltz, dated March 31, 2016	
	193		Subpoena for Adam Foltz to testify at a deposition, dated March 22, 2016	
	194		Flash drive and DVD produced by Adam Foltz, March 31, 2016	
	195		Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated December 21, 2011	
	196		Subpoena for Adam Foltz to testify at a deposition, dated December 13, 2011	
	197		Letter outlining Documents Produced in Response to Subpoena Issued by Plaintiffs to Adam Foltz/Foltz Privilege Log, dated December 21, 2011	
	198		Document produced by Foltz at December 21, 2011 deposition titled 2011-2012 Legislature SB 148 Memo 1	
	199		DVD identified as Adam Foltz Documents Responsive to December 13, 2011 subpoena	
	200		DVD identified as Adam Foltz Statewide Database	
	201		Order dated December 8, 2011 by U.S. District Judge J.P. Stadtmueller	
	202		Order dated December 20, 2011 by U.S. District Judge J.P. Stadtmueller	
	203		December 13, 2011 expert report of Ronald Keith Gaddie, Ph.D.	
	204		December 14, 2011 expert report of John Diex/Magellan Strategies BR	

Date	Identification		Description	Offers, Objections,
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	205		Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated February 1, 2012	
	206		Breakdown of Regions pdf	
	207		Email from Andy Speth to Judi Rhodes, Tad Ottman dated June 14, 2011	
	208		Email from Andy Speth to Judi Rhodes, Tad Ottman, Andy Gustofson, Adam Foltz, dated June 15, 2011	
	209		Email from Andy Speth to Tad Ottman, Adam Foltz, dated June 21, 2011	
	210		Email chain between Tad Ottman, Adam Foltz, and Michelle Litjens, dated July 7, 2011	
	211		Email from Andrew Welhouse dated July 8, 2011	
	212		Census data (exhibit 112 to February 1, 2012 Foltz deposition)	
	213		General Talking Points Memo by Foltz	
	214		Metadata document showing Adam Foltz as creator on June 20, 2011	
	215		Transcript of Adam Foltz 30(b)(6) Deposition from <i>Baldus</i> case, dated April 30, 2013	
	216		Transcript of Adam Foltz Deposition from <i>Baldus</i> case, dated April 30, 2013	
	217		Subpoena for Adam Foltz to appear at a deposition, dated April 22, 2013	
	218		Declaration of Adam Foltz, dated April 25, 2013	
	219		Supplement to Declaration, dated April 26, 2013	
	220		Defendants Rule 26(a)(1) initial disclosures, <i>Whitford</i> litigation	
	221		<i>Baldus</i> opinion, 849 F. Supp. 2d 840 (E.D. Wis. 2012)	

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	222		Transcript of March 23, 2016 <i>Whitford</i> motion hearing	
	223		Amended Mark Lanterman Declaration and DVD (image), dated March 18, 2016	
	224		Curriculum Vitae of Mark Lanterman	
	225		Computer Forensic Services DVD	
	226		Transcript of Tad Ottman deposition, dated March 31, 2016	
	227		Video deposition of Tad Ottman, dated March 31, 2016	
	228		Subpoena for Tad Ottman to testify at a deposition, dated March 22, 2016	
	229		Flash drive and DVD produced by Tad Ottman, March 31, 2016	
	230		Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated December 22, 2011	
	231		Letter Outlining Documents Produced in Response to Subpoena Issued by Plaintiffs to Tad Ottman/Privilege Log dated December 22, 2011	
	232		Documents Produced by Tad Ottman	
	233		DVD identified as Tad Ottman Documents Responsive to December 13, 2011 Subpoena	
	234		Subpoena for Tad Ottman to testify at a deposition, dated December 13, 2011	
	235		Emails containing information that was inadvertently redacted, July 8-11, 2011	
	236		Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated February 2, 2012	
	237		Ottman Questions and Responses Document (Ottman 000095 – 000096)_	
	238		Current Map chart and emails between Tad Ottman and Andy Speth (Ottman 000117 – 000120)	



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	239		Email from Leah Vukmir to Tad Ottman, dated May 4, 2011 (Ottman000131.pdf)	
	240		Current Assembly/Senate Chart MayQandD (Ottman 000144)	
	241		Ottman Talking Points Memo (Ottman000141.pdf)	
	242		Senate District Information (Ottman 000145 – 000161)	
	243		Confidentiality and Nondisclosure Related to Reapportionment Agreements between Michael, Best & Friedrich and 16 Senators	
	244		Confidentiality and Nondisclosure Related to Reapportionment Agreements between Michael, Best & Friedrich and 58 Assembly Representatives	
	245		Outline for Tad Ottman testimony (Ottman 000102 – 000103)	
	246		Transcript of Tad Ottman 30(b)(6) deposition in Baldus case, dated April 30, 2013	
	247		List of paid staff of Senator Fitzgerald June 1, 2012 through February 28, 2013	
	248		Emails and documents related to SB 150	
	249		Email from Tad Ottman to Ray Taffora, Jim Troupis, Adam Foltz, Eric McLeod re Timeline Update, dated June 30, 2011	
	250		Email from Eric McLeod to Jim Troupis, Ray Taffora, Adam Foltz, Tad Ottman re Amendment on Effective Date of Redistricting, dated October 10, 2011	

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	251		Email from Senator Fitzgerald to Tad Ottman re ALEC Conference Call on Redistricting, dated January 20, 2011	Objection: hearsay and relevance
	252		March 5, 2012 Letter from Eric McLeod to Douglas Poland	Objection: hearsay and relevance
	253		March 8, 2012 Letter from Douglas Poland to Eric McLeod	Objection: hearsay and relevance
	254		March 13, 2012 Letter from Eric McLeod to Douglas Poland	Objection: hearsay and relevance
	255		March 15, 2012 Letter from Douglas Poland to Eric McLeod	Objection: hearsay and relevance
	256		Email from Joseph Olson to Douglas Poland and Eric McLeod, dated March 16 and 17, 2012	Objection: hearsay and relevance
	257		Letter from Michael, Best & Friedrich to Ottman re: Confidentiality and Nondisclosure Related to Reapportionment dated July 27, 2010	Objection: hearsay and relevance
	258		Letter from Douglas Poland to Joseph Olson and Eric McLeod, dated June 13, 2012	Objection: hearsay and relevance
	259		Transcript of Tad Ottman Deposition in <i>Baldus</i> case, dated April 30, 2013	
	260		Subpoena for Tad Ottman to appear at a deposition, dated April 22, 2013	
	261		Declaration of Tad Ottman, dated April 25, 2013	
	262		GOP Seats Senate.docx	
	263		C_Users_afoltz_Desktop_Projects_Composite_Adam_Assertive_Curve.xlsx	
	264		C_Users_afoltz_Desktop_Projects_Composite_Current_Curve.xlsx	
	265		C_Users_afoltz_Desktop_Projects_Composite_Joe_Assertive_Curve.xlsx	
	266		C_Users_afoltz_Desktop_Projects_Composite_Joe_Base_Curve.xlsx	

Date	Identification		Description	Offers, Objections,
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	267		C_Users_afoltz_Desktop_Projects_TadAggressiveCurve.xlsx	
	268		C_Users_afoltz_Desktop_Projects_Team_Map_Curve.xlsx	
	269		C_Users_Public_Documents_Senate_Current_Curve.xlsx	
	270		C_Users_tottman.WRK32587_Documents_Documents_Senate_Current_Curve.xlsx	
	271		C_Users_tottman.WRK32587_Documents_Documents_Tad_Senate_Assertive_Curve.xlsx	
	272		Composite_Adam_Assertive_Curve.xlsx	
	273		Composite_Current_Curve.xlsx	
	274		Composite_Joe_Assertive_Curve.xlsx	
	275		Composite_Joe_Base_Curve.xlsx	
	276		Senate_Current_Curve.xlsx	
	277		Senate_Current_Curve1.xlsx	
	278		Tad_Senate_Assertive_Curve.xlsx	
	279		Tad_Senate_Assertive_Curve1.xlsx	
	280		TadAggressiveCurve.xlsx	
	281		Team_Map_Curve_Senate.xlsx	
	282		Team_Map_Curve.xlsx	
	283		Summaries.xlsx	
	284		Summary.xlsx	
	285		C\Users\afoltz\Desktop\Workspace\Kessler\Kessler_Map_Data\asm.xls	Objection: relevance
	286		C\Users\afoltz\Desktop\Workspace\Kessler\Pass1_Key.xls	Objection: relevance
	287		C\Users\afoltz\Desktop\Workspace\Kessler\asm.xls	Objection: relevance
	288		C\Users\afoltz\Desktop\Workspace\Kessler\asm_jobs.xls	Objection: relevance
	289		C\Users\afoltz\Desktop\Workspace\Kessler\Redistricting\Kessler_Plan_061407_0807\061407_080707_Final.xls	Objection: relevance

Date	Identification		Description	Offers, Objections,
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	290		Transcript of Joseph Handrick deposition, dated December 20, 2011	
	291		Subpoena to Joseph Handrick from Douglas M. Poland, dated December 13, 2011	
	292		Packet of documents produced by Joseph Handrick via Eric M. McLeod pursuant to the subpoena	
	293		Population Totals	
	294		CD labeled Joe Handrick Draft Maps – Block Assignment Files	
	295		February 15, 2011 Letter to Don M. Millis and Joseph W. Handrick from Eric M. McLeod re: Retention of Joseph Handrick	
	296		February 17, 2011 Letter to Eric M. McLeod from Don M. Millis Engagement Letter	
	297		February 18, 2011 Letter to Eric M. McLeod from Don M. Millis Amended Engagement Letter	
	298		Bio of Joseph W. Handrick from the website of Reinhart	
	299		Joe Handrick's lobbyist license dated January 25, 2011	
	300		Excerpts from the book Born to Run by Ronald Keith Gaddie	Objection: hearsay
	301		Defendants' Amended Initial Rule 26(a) Disclosures in <i>Baldus</i>	Objection: relevance
	302		Second Amended Complaint for Declaratory and Injunctive Relief in <i>Baldus</i>	Objection: hearsay
	303		Defendants' Answer and Affirmative Defenses to Second Amended Complaint for Declaratory and Injunctive Relief in <i>Baldus</i>	Objection: relevance and hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	304		Plaintiffs' First Set of Interrogatories and First Request for Production of Documents in <i>Baldus</i>	Objection: relevance and hearsay
	305		Chapter 801.17, Commencement of Action and Venue	Objection: relevance
	306		Chapter 751, Supreme Court	Objection: relevance
	307		December 2, 2011 to Kathleen Madden from Joseph Louis Olson with attached Amended Summons and Amended Complaint for Declaratory and Other Relief	Objection: relevance and hearsay
	308		WITHDRAWN	
	309		WITHDRAWN	
	310		WITHDRAWN	
	311		Transcript of Joseph Handrick deposition, dated February 1, 2012	
	312		Letter from Eric M. McLeod to Douglas Poland with Supplemental Production in Response to Subpoenas Issued by Plaintiffs to Joe Handrick, Adam Foltz, and Tad Ottman, dated January 10, 2012	
	313		Letter from Eric M. McLeod to Douglas Poland with additional documents, dated January 11, 2012	
	314		Summary Core Constituency Report	
	315		Series of emails between Joseph Handrick and Jim Troupis, dated January 14, 2011	
	316		Series of emails between Joseph Handrick and Jim troupis, dated January 17, 2011	
	317		Series of emails between Joseph Handrick, Tad Ottman, dated January 25, 2011	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	318		Series of emails between Joseph Handrick and Jim Troupis, dated February 1, 2011	
	319		Emails between Joseph Handrick, Tad Ottman, dated February 14, 2011	
	320		Printout of menu of a disk	
	321		Transcript of Joseph Handrick deposition, dated April 30, 2013	
	322		Subpoena for Joseph Handrick to appear at a deposition dated April 22, 2013	
	323		Demonstrative Exhibit - Charts Tracking Vote Share, Seat Share, Efficiency Gap, and Efficiency Gap Durability for Draft Act 43 Plans	Reserve right to object pending verification
	324		Demonstrative Exhibit - Charts Showing Efficiency Gap and Compliance with Traditional Criteria for Wisconsin Plans by Decade	Reserve right to object pending verification
	325		Demonstrative Exhibit - Charts Showing Correlations Between Efficiency Gap and Alternative Measures of Partisan Gerrymandering	Reserve right to object pending verification
	326		WITHDRAWN	Reserve right to object pending verification
	327		WITHDRAWN	Reserve right to object pending verification
	328		WITHDRAWN	Reserve right to object pending verification

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	329		Demonstrative Exhibit - Charts Showing Values and Time Trends of Efficiency Gap and Alternative Measures of Partisan Gerrymandering for Wisconsin	Reserve right to object pending verification
	330		WITHDRAWN	Reserve right to object pending verification
	331		Wisconsin Legislative Council Act Memo: 2011 Wisconsin Act 39	
	332		Litigation in the 2010 Cycle, All About Redistricting, <a href="http://redistricting.lls.edu/cases.php">http://redistricting.lls.edu/cases.php</a>	Objection: hearsay
	333		Bernard Grofman & Gary King, The Future of Partisan Symmetry as a Judicial Test for Partisan Gerrymandering After LULAC v. Perry (2007) article	Objection: hearsay
	334		Wisconsin State Legislature, Senate Bill 148: History, <a href="https://docs.legis.wisconsin.gov/2011/proposals/sb148">https://docs.legis.wisconsin.gov/2011/proposals/sb148</a>	
	335		Joseph Handrick Timesheets April 13, 2011 to April 20, 2011	
	336		Joseph Handrick Timesheets May 25, 2011 to May 26, 2011	
	337		Joe_base_map.xlsx.pdf spreadsheet with printed metadata from Joseph Handrick's document production in January 2012	
	338		Joe_map_assert.xlsx.pdf spreadsheet with printed metadata from Joseph Handrick's document production in January 2012	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	339		Stipulation Regarding 30(b)(6) Depositions of the Legislative Technology Services Bureau and Wisconsin State Senate and Assembly, dated March 18, 2016	
	340		Plaintiffs' First Set of Requests for Admission and Attachments 1-9, dated February 5, 2016	
	341		Defendants' Response to Plaintiffs' First Set of Requests for Admission, dated March 7, 2016	
	342		Individual Legislator Memos and Maps from Adam Foltz to Republican Legislators (ADAMFOLZSUPPPROD000119.PDF)	
	343		Declaration of Mark Lanterman in <i>Baldus</i> , dated February 15, 2013	Objection: hearsay and relevance for anything other than chain of custody
	344		Declaration of Mark Lanterman in <i>Baldus</i> , dated March 11, 2013	Objection: hearsay and relevance for anything other than chain of custody
	345		Third Declaration of Mark Lanterman in <i>Baldus</i> , dated April 20, 2013	Objection: hearsay and relevance for anything other than chain of custody
	346		Email chain between Tad Ottman, Joseph Handrick, and Adam Foltz dated August 3, 2011 (Handrick000352.pdf)	
	347		Email chain between Eric McLeod, Tad Ottman, Adam Foltz, Sarah Troupis, Jim Troupis re: "Letters of Retention—Gaddie & Handrick," dated February 11, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	



Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	348		Email from Jim Troupis to Eric McLeod, Adam Foltz, Tad Ottman, Sarah Troupis re: Experts and Bernard Grofman, dated June 21, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	
	349		Email from Tad Ottman to Jim Troupis, Eric McLeod re: the "redistricting team," dated May 16, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	
	350		Email from Tad Ottman to Eric McLeod, Jim Troupis, Raymond Taffora, Sarah Troupis, Adam Foltz re: Revised Timeline, dated July 8, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	
	351		Email from Jim Troupis to Tad Ottman, Adam Foltz, Eric McLeod, Sarah Troupis re: "Gaddie & Hispanic," dated June 13, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	
	352		Email chain between Tad Ottman, Eric McLeod, Jim Troupis, Adam Foltz re: Meeting with Joe Handrick, dated February 15, 2011 (from 11-CV-562 DISC 2012-02-17 Legislature Released Docs_MBF 000202.pdf)	
	353		Transcript of Proceedings, Joint Public Hearing on Wisconsin Redistricting Plan, dated July 13, 2011	Objection: hearsay
	354		June 20-24, 2011 Adam Foltz Legislator Meetings Schedule (ADAMFOLZSUPPPROD000431.pdf)	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	355		Senate Motion to Hire Michael, Best & Friedrich and Troupis Law, dated January 3, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-2)	
	356		Assembly Motion to Hire Michael, Best & Friedrich dated January 4, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-3)	
	357		Letter from Democratic Leadership Protesting Hiring of Michael Best, & Friedrich, dated January 5, 2011 (part of the record in <i>Baldus</i> , 11-cv-562, docket 81-4)	Objection: hearsay
	358		Cartographic Boundary Shapefiles State Legislative Districts – Lower 2006	
	359		Cartographic Boundary Shapefiles State Legislative Districts – Census 2000	
	360		Email from Tad Ottman to Jim Troupis, Eric McLeod, Ray Taffora, Adam Foltz re drawing of districts, dated July 13, 2011	
	361		Email from Tad Ottman to Jim Troupis, Eric McLeod, Adam Foltz re: redistricting timeline, dated February 25, 2011	
	362		Email from Tad Ottman to Jim Troupis, Eric McLeod, Ray Taffora, Adam Foltz re: Hearing Memos, dated July 12, 2011	
	363		Foltz Population Deviation by Party Chart – Foltz001075	
	364		Tad MayQandD Chart – TADOTTMANSUPPPROD000094	
	365		Ottman MayQandD_base2 Chart – TADOTTMANSUPPPROD000095	
	366		Ottman Joe Assertive Chart - TADOTTMANSUPPPROD000097	

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	367		Ottman MayQandD_NE Chart - TADOTTMANSUPPPROD000102.pdf	
	368		Demonstrative Exhibit – Act 43 Showing District by District Maps	Reserve right to object pending verification
	461		Jackman R Code	Objection: untimely under pretrial order
	462		Jackman Reliance Data	Objection: untimely under pretrial order
	463		Map Room Access Policy - Legis010879.pdf	Objection: untimely under pretrial order
	464		Wisconsin_Election_Data.xlsx	Objection: untimely under pretrial order
	465		joe base map numbers.xlsx	Objection: untimely under pretrial order
	466		WRK32864 Responsive Spreadsheets Deduplicated File	Objection: untimely under pretrial order
	467		/Users/tad/Desktop/PlanComparisons.xlsm	Objection: untimely under pretrial order
	468		TROUPISLAWOFFICE000091.PDF	Objections: untimely under pretrial order, hearsay
	469		Memo from Jim Troupis to Eric McLeod, Tad Ottman, Adam Foltz on December 15, 2011 titled “Map Evaluation” (MBF000126-MBF000127), pages 21-22 of 63 in document 156-1 filed in Baldus.	Objection: untimely under pretrial order
	470		Emails between Jim Troupis, Eric McLeod, Tad Ottman, Ray Taffora, Cced to Adam Foltz on June 24, 2011 titled “Legislative drafts,” (MBF000141), page 36 of 63 in document 156-1 filed in Baldus.	Objection: untimely under pretrial order
	471		Email from Dana Wolff to Tad Ottman, Adam Foltz, Cced to Tony Van Der Wielen on May 9, 2011, titled “Letter,” listing attachment “MCD_Letter.pdf” (ADAMFOLZSUPPPROD000446)	Objection: untimely under pretrial order
	472		Republican State Leadership Committee (RSLC) 2012 REDMAP Summary Report (Jan. 4, 2013)	Objections: untimely under pretrial order, hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	473		D. James Greiner, <i>Ecological Inference in Voting Rights Act Disputes: Where Are We Now, and Where Do We Want to Be?</i> , 47 <i>Jurimetrics</i> 115, 155-57 (2007)	Objections: untimely under pretrial order, hearsay
	474		Jackman Rebuttal R Code	Objection: untimely under pretrial order

## Exhibits Plaintiffs May Use

EXHIBIT (S) OF				
Plaintiffs		WILLIAM WHITFORD, <i>et al.</i>		
(Indicate plaintiff or defendant)		V. Case No. <u>15-cv-421-bbc</u>		
		GERALD NICHOL, <i>et al.</i>		
Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
	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	Hearsay
	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)	Hearsay
	373		Ansolabehere, Stephen and James M. Snyder. 2012. "The Effects of Redistricting on Incumbents." <i>Election Law Journal</i> 11:490-502 (No. 4)	Hearsay
	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)	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	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)	Hearsay
	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)	Hearsay
	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)	Hearsay
	378		WITHDRAWN	Hearsay
	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)	Hearsay
	380		WITHDRAWN	Hearsay
	381		King, Gary. 1996. "Why Context Should Not Count." <i>Political Geography</i> 15:159-163 (No. 2)	Hearsay
	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)	Hearsay
	383		McDonald, Michael P. 2006. "Drawing the Line on District Competition." <i>PS: Political Science and Politics</i> 39:99-104 (No 1, January)	Hearsay
	384		McDonald, Michael P. 2014. "Presidential Vote Within State Legislative Districts." <i>State Politics &amp; Policy Quarterly</i> 14:196-204 (No. 2)	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	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)	Hearsay
	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)	Hearsay
	387		WITHDRAWN	Hearsay
	388		Edgeworth, FY. 1898. "Applications of the Theory of Probability." <i>Journal of the Royal Statistical Society</i> 51:534	Hearsay
	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	Hearsay
	390		Niemi, Richard G. and Patrick Fett. 1986. "The Swing Ratio: An Explanation and an Assessment." <i>Legislative Studies Quarterly</i> 11:75-90	Hearsay
	391		Niemi, Richard G. and Simon Jackman. 1991. "Bias and Responsiveness in State Legislative Districting." <i>Legislative Studies Quarterly</i> 16:183-202	Hearsay
	392		Tufte, Edward R. 1973. "The Relationship Between Seats and Votes in Two-Party Systems." <i>American Political Science Review</i> 67:540-554	Hearsay
	393		Altman, Micah and McDonald, Michael 2010, "The Promise and Perils of Computers in Redistricting." 2010. <i>Duke Journal of Constitutional Law &amp; Public Policy</i> 5:69-111	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	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	Hearsay
	395		National Conference of State Legislators. September 29, 2009. <i>Redistricting Law 2010</i>	Hearsay
	396		Bivand, Roger, and Gianfranco Piras. 2015. "Comparing Implementations of Estimation Methods for Spatial Econometrics." <i>Journal of Statistical Software</i> 63:1-36	Hearsay
	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	Hearsay
	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	Hearsay
	399		Dawkins, Casey J. 2007. "Space and the Measurement of Income Segregation." <i>Journal of Regional Science</i> 47:255-272	Hearsay
	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	Hearsay
	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	Hearsay
	402		2000s Redistricting Case Summaries, National Conference of State Legislatures, <a href="http://www.senate.mn/departments/scr/redist/redsum2000/redsum2000.htm#AL">http://www.senate.mn/departments/scr/redist/redsum2000/redsum2000.htm#AL</a>	Hearsay



Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	403		1990s Redistricting Case Summaries, National Conference of State Legislatures, <a href="http://www.senate.mn/departments/scr/redist/redout.htm">http://www.senate.mn/departments/scr/redist/redout.htm</a>	Hearsay
	404		1980s Redistricting Case Summaries, National Conference of State Legislatures, <a href="http://www.senate.mn/departments/scr/redist/Redsum1980/redsum1980.htm">http://www.senate.mn/departments/scr/redist/Redsum1980/redsum1980.htm</a>	Hearsay
	405		Michael McDonald & Robin Best, Unfair Partisan Gerrymanders in Politics and Law: A Diagnostic Applied to Six Cases, 14 Election Law Journal 312 (2015)	Hearsay
	406		Eric McGhee, Measuring Efficient Partisan Bias (2016), prepared for the Annual Conference of the Midwest Political Science Association April 7-10, 2016.	Hearsay
	407		John Nagle, How Competitive Should a Fair Single Member Districting Plan Be? (2016)	Hearsay
	408		Samuel Wang, Three Tests for Practical Evaluation of Partisan Gerrymandering, 68 Stanford Law Review (2016)	Hearsay
	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)	Hearsay
	410		Easha Anand, Finding a Path through the Political Thicket: In Defense of Partisan Gerrymandering's Justiciability, 102 Cal L Rev 917 (2014)	Hearsay
	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)	Hearsay
	412		Nicholas Stephanopoulos, Spatial Diversity, 125 Harv L Rev 1903 (2012)	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	413		Boris Shor and Nolan McCarty, The Ideological Mapping of American Legislatures, 105 Am Pol Sci Rev 530 (2011)	Hearsay
	414		Andrew Gelman and Gary King, Enhancing Democracy through Legislative Redistricting, 88 Am Pol Sci Rev 541 (1994)	Hearsay
	415		Gary King and Robert X. Browning, Democratic Representation and Partisan Bias in Congressional Elections, 81 Am Pol Sci Rev 1251 (1987)	Hearsay
	416		WITHDRAWN	Hearsay
	417		Simon Jackman, Measuring Electoral Bias: Australia, 1949-93, 24 Brt J Pol Sci 319 (1994)	Hearsay
	418		Nicholas Stephanopoulos, The Consequences of Consequentialist Criteria, 3 UC Irvine L Review 669 (2013)	Hearsay
	419		Arden Rowell and Jessica Bregant, Numeracy and Legal Decision Making, 46 Ariz St L J 191 (2014)	Hearsay
	420		Jeffrey A. Taylor, Paul S. Herrnson, and James M. Curry, The Impact of Multimember Districts on Legislative Effort and Success	Hearsay
	421		Lani Guinier, Groups, Representation, and Race-Conscious Districting: A Case of the Emperor's Clothes, 71 Tex L Rev 1589 (1993)	Hearsay
	422		Guillermo Owen and Bernard Grofman, Optimal Partisan Gerrymandering, 7 Pol Geography Q 5 (1988)	Hearsay
	423		Jason Mercier, Proposed Constitutional Amendments Would Require Supermajority Vote for Tax Increases (Washington Policy Center, Feb 2013)	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	424		Janet Campagna and Bernard Grofman, Party Control and Partisan Bias in 1980s Congressional Redistricting, 52 J Politics 1242 (1990)	Hearsay
	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)	Hearsay
	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)	Hearsay
	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)	Hearsay
	428		Adam B. Cox, Partisan Gerrymandering and Disaggregated Redistricting, 2004 S Ct Rev 409	Hearsay
	429		John Sides and Eric McGhee, Redistricting Didn't Win Republicans the House (Wash Post Wonkblog, Feb 17, 2013)	Hearsay
	430		WITHDRAWN	Hearsay
	431		WITHDRAWN	Hearsay
	432		WITHDRAWN	Hearsay
	433		David Epstein et al, Estimating the Effect of Redistricting on Minority Substantive Representation, 23 J L, Econ & Org 499 (2007)	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	434		Kevin A. Hill, Does the Creation of Majority Black Districts Aid Republicans? An Analysis of the 1992 Congressional Elections in Eight Southern States, 57 J Politics 384 (1995)	Hearsay
	435		David Lublin and D. Stephen Voss, Racial Redistricting and Realignment in Southern State Legislatures, 44 Am J Pol Sci 792 (2000)	Hearsay
	436		WITHDRAWN	Hearsay
	437		Todd Makse, Defining Communities of Interest in Redistricting through Initiative Voting, 11 Election L J 503 (2012)	Hearsay
	438		Adam B. Cox and Richard T. Holden, Reconsidering Racial and Partisan Gerrymandering, 78 U Chi L Rev 553 (2011)	Hearsay
	439		Jonathan Rodden, The Geographic Distribution of Political Preferences, 13 Ann Rev Pol Sci 321 (2010)	Hearsay
	440		Altman, Micah. 2002. "A Bayesian Approach to Detecting Electoral Manipulation." Political Geography 21:39-48	Hearsay
	441		Born, Richard. 1985. "Partisan Intentions and Election Day Realities in the Congressional Redistricting Process." The American Political Science Review 79 (2): 305-19	Hearsay
	442		Brace, Kimball, Bernard Grofman, and Lisa Handley. 1987. "Does Redistricting Aimed to Help Blacks Necessarily Help Republicans?" Journal of Politics 49(1): 169-85	Hearsay
	443		WITHDRAWN	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	444		WITHDRAWN	Hearsay
	445		WITHDRAWN	Hearsay
	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	Hearsay
	447		Engstrom, Erik J. 2006. "Stacking the States, Stacking the House: The Partisan Consequences of Congressional Redistricting in the 19 <sup>th</sup> Century." American Political Science Review 100 (03): 419-27	Hearsay
	448		Erikson, Robert S. 1972. "Malapportionment, Gerrymandering, and Party Fortunes in Congressional Elections." American Political Science Review 66 (4): 1234-45	Hearsay
	449		Gelman, Andrew, Gary King, and Andrew C. Thomas. 2008. "JudgeIt II: A Program for Evaluating Electoral Systems and Redistricting Plans."	Hearsay
	450		Gilligan, Thomas W., and John G. Matsusaka. 1999. "Structural Constraints on Partisan Bias Under the Efficient Gerrymander." Public Choice 100: 65-84	Hearsay
	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." Electoral Studies 16(4): 457-70	Hearsay

Date	Identification		Description	Offers, Objections,
	No.	Witness		Rulings, Exceptions
	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." PS: Political Science & Politics 41 (4): 729-32	Hearsay
	453		Kousser, J. Morgan. 1996. "Estimating the Partisan Consequences of Redistricting Plans-Simply." Legislative Studies Quarterly 21 (4): 521-41	Hearsay
	454		McDonald, Michael P. 2004. "A Comparative Analysis of Redistricting Institutions in the United States, 2001-02." State Politics & Policy Quarterly 4(4): 371-95	Hearsay
	455		WITHDRAWN	Hearsay
	456		Niemi, Richard G. and John Deegan, Jr. 1978. "A Theory of Political Districting." The American Political Science Review 72 (4): 1304-23	Hearsay
	457		Shotts, Kenneth W. 2001. "The Effect of Majority-Minority Mandates on Partisan Gerrymandering." American Journal of Political Science 45 (1):120-35	Hearsay
	458		WITHDRAWN	Hearsay
	459		WITHDRAWN	Hearsay
	460		Yoshinaka, Antoine, and Chad Murphy. 2009. "Partisan Gerrymandering and Population Instability: Completing the Redistricting Puzzle." Political Geography 28: 451-62.	Hearsay