

Exhibit B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KAREN DAVIDSON,
DEBBIE FLITMAN,
EUGENE PERRY,
SYLVIA WEBER, and
AMERICAN CIVIL LIBERTIES UNION OF
RHODE ISLAND,

Plaintiffs

v.

CITY OF CRANSTON, RHODE ISLAND,

Defendant

C.A. No. 1:14-cv-00091-L-LDA

**CITY OF CRANSTON, RHODE ISLAND'S RESPONSE TO
PLAINTIFFS' FIRST SET OF REQUEST FOR ADMISSION**

Defendant, City of Cranston, Rhode Island (the "City" or "Cranston") hereby responds to Plaintiffs' Request for Admissions propounded by Plaintiffs, Karen Davidson, Debbie Flitman, Eugene Perry, Sylvia Weber and American Civil Liberties Union of Rhode Island ("Plaintiffs").

GENERAL OBJECTIONS

1. The City objects generally to each and every Request for Admission on the following grounds. These general objections are set forth here to avoid excessive duplication and the City incorporates the following general objections into each and every individual answer to Plaintiffs' Requests contained herein and into each and every amendment, supplement, or modification to these answers.

2. The City objects to each Request for Admission to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client

privilege, the work-product doctrine, the joint defense privilege, the common interest privilege, the trade secret or proprietary information privilege, or any other judicially recognized privilege or protection. Privileged or protected information that may be responsive to a particular Request will not be provided. The City does not waive or intend to waive, but rather intends to preserve and is preserving, the attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, the common interest privilege, and every other judicially recognized protection and privilege with respect to all information and documents subject thereto.

3. The City objects to each Request for Admission to the extent that it seeks admissions not relevant or of little or no benefit to this matter. The City also objects to each Request to the extent that the Request assumes facts with which the City does not agree. By responding to these Requests, the City does not admit or concede any factual assumptions made by Plaintiffs.

4. The City objects to each Request for Admission to the extent it seeks information concerning legal contentions and supporting facts that are not reasonably ascertainable or available at this stage of the litigation, on the grounds that it is overbroad, unduly burdensome, harassing, oppressive, and premature. The City reserves the right to amend or supplement its response to any such Request.

5. The City objects to each Request for Admission to the extent that it seeks to impose obligations beyond those provided by Rule 36 of the Federal Rules of Civil Procedure or Rules of this Court.

REQUEST NO. 1.

The population of the City of Cranston on April 1, 2010 according to the United States Bureau of the Census was 80,387, as listed in 2010 Census Summary File 1, Table P1,

available at http://factfinder2.census.gov/bkmk/table/1.0/en/DEC/10_SF1/P1/0600000US4400719180|1600000US4419180.

RESPONSE NO. 1.

Admitted.

REQUEST NO. 2.

The total population of Ward 6 of the City of Cranston (including the population of the Adult Correction Institutions, or ACI) as created by the City's redistricting plan, enacted April 17, 2012, was 13,642, as listed in the City's Resolution No. 2012-20 "Resolution of the City Council adopting a redistricting plan for the city's six wards" attachment "Redistricting Project – Population Distribution (2010 Census Data)", available at [http://www.cranstonri.com/pdf/calendar_meetings/2012_04_17Special\(Redistricting%20Plan%20Approval\).pdf](http://www.cranstonri.com/pdf/calendar_meetings/2012_04_17Special(Redistricting%20Plan%20Approval).pdf).

RESPONSE NO. 2.

Admitted.

REQUEST NO. 3.

The total population of the ACI according to 2010 Census data was 3,433, as listed in the 2010 Census Summary File 1, Table 42, available at http://factfinder2.census.gov/bknc/table/1.0/en/Dec/10_SF1/P42/0600000US4400719180|1600000US4419180.

RESPONSE NO. 3.

Admitted.

REQUEST NO. 4.

The population of Ward 6 of the City of Cranston without including the population of the ACI is 10,209.

RESPONSE NO. 4.

Admitted.

REQUEST NO. 5.

The most populous Ward in Cranston, Ward 5, according to 2010 Census data, has a population of 13,817, as listed in the City's Resolution No. 2012-20 "Resolution of the City Council adopting a redistricting plan for the city's six wards" attachment "Redistricting Project – Population Distribution (2010 Census Data)", *available at*

http://www.cranstonri.com/pdf/calendar_meetings/2012_04_17Special

(Redistricting%20Plan%20Approval).pdf.

RESPONSE NO. 5.

Admitted.

CITY OF CRANSTON, RHODE ISLAND

By Its Attorneys,

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Dated: December 22, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF REQUEST FOR ADMISSIONS was mailed, postage prepaid, on this *22nd* day of December, 2014 to:

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