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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

H. ROBIN SAMUELSEN, JR.,
RUSSELL S. NELSON, VICKI OTTE,
MARTIN B. MOORE, SR.,

Plaintiffs,

v.

MEAD TREADWELL, in his official
capacity as Lieutenant Governor for the
State of Alaska; and GAIL FENUMIAI,
in her official capacity as Director of the
Division of Elections for the State of
Alaska,

Defendants.

Case No.: 3:12-cv-00118-RRB-AK-JKS

**DECLARATION OF TAYLOR
BICKFORD IN SUPPORT OF
MEMORANDUM OF *AMICUS*
CURIAE THE ALASKA
REDISTRICTING BOARD RE:
MOTION FOR PRELIMINARY
INJUNCTION**

I, TAYLOR BICKFORD, hereby declare and state as follows:

1. I am the Executive Director of the Alaska Redistricting Board (“the Board”), and as such, have personal knowledge of, and can testify to all of the facts set forth below.

2. On May 25, 2012, the Board submitted its request for preclearance of the Amended Proclamation Plan with the Department of Justice (“DOJ”).

3. On June 4, 2012, Chairman John Torgerson, Board member Marie Greene, myself, legal counsel Michael White, and the Board’s Voting Rights Act expert, Dr. Lisa Handley, met in-person with representatives from the DOJ in Washington, D.C. to discuss the Amended Proclamation Plan. Chairman John Torgerson and Board member Marie Greene advocated for preclearance of the Amended Proclamation Plan along with input from each of the other Board personnel.

4. At the end of our presentation, we asked the DOJ representatives if they had any questions for us. The DOJ posed no substantive questions as to the Amended Proclamation Plan. Instead, the DOJ’s only questions related to the Board’s request for expedited consideration, and specifically the latest date the Board felt Alaska had to have a preclearance decision. We informed the DOJ that the Board was requesting a decision “as soon as possible”, while also noting the Board’s written submission requested a decision by no later than June 30, 2012. We did acknowledge the absolute latest possible date would be July 10, 2012, in recognition of the 45-day requirement of the federal Uniformed and Overseas Citizens Absentee Voting Act (“UOCAVA”) and the Military and Overseas Voter Empowerment Act (“MOVE”) amendments to UOCAVA, as expressed by the Division of Elections.

5. Based on subsequent communications with DOJ representatives, it appears the DOJ will likely honor the Board’s request for expedited consideration and issue its preclearance decision within the next couple of weeks.

Declaration of Taylor Bickford

Samuelson, et al. v. Treadwell, et al., Case No.: 3:12-cv-0118 RRB-AK-JKS

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6. As part of my duties with the Board, I was tasked with researching the process used by the 2000 Redistricting Board, the first board to redistrict Alaska's House and Senate districts under the 1998 amendments to the Alaska Constitution. As part of this process, I investigated the preclearance process used by the 2000 Board. The 2000 Alaska Redistricting Board also requested expedited consideration of its second submission for preclearance after the Board's original adopted and precleared plan was invalidated in state court litigation. The DOJ honored the 2000 Redistricting Board's request for expedited consideration of the submission of its Amended Final Plan, which it filed on April 25, 2002, and granted preclearance 46 days later on June 10, 2002. If the DOJ were to follow a similar time frame here, the DOJ should issue its preclearance decision regarding the current Board's Amended Proclamation Plan on or about July 10, 2012, the exact date requested by the Board.

7. The DOJ did not request additional information in regard to the Board's first submission requesting preclearance of the original Proclamation Plan. To date, the DOJ has made no request for additional information in regard to the Amended Proclamation Plan submission either.

8. I have reviewed this document and given permission to Board counsel to file this document using my electronic signature.

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

s/ *Taylor Bickford*

Taylor Bickford

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of June 2012, a true and correct copy of the foregoing was served via CM/ECF upon:

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/s/ Michael D. White
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