

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

COMMON CAUSE FLORIDA, et al.,

Plaintiffs, and

MICHAEL ARTEAGA, LENI  
FERNANDEZ, ANDREA  
HERSHORIN, JEAN ROBERT  
LOUIS, MELVA BENTLEY ROSS,  
DENNY TRONCOSO, BRANDON  
NELSON, GERALDINE WARE, and  
NINA WOLFSON,

Intervenor-Plaintiffs,

v.

LAUREL M. LEE, in her official  
capacity as Florida Secretary of State,

Defendant.

Case No. 4:22-cv-00109-AW-MAF

**DECLARATION OF JOHN DEVANEY IN SUPPORT OF ARTEAGA  
INTERVENOR-PLAINTIFFS' SUBMISSION**

Pursuant to 20 U.S.C. § 1746, I, John Devaney, declare as follows:

1. My name is John Devaney. I am an attorney with the law firm of Perkins Coie LLP, and I am counsel for Arteaga Intervenor-Plaintiffs in the above-captioned matter. I make this declaration pursuant to this Court's April 11, 2022 Order setting a schedule for these proceedings, instructing Plaintiffs and Intervenor-

Plaintiffs to submit expert reports, affidavits, declarations, and other evidence supporting their proposed maps by April 18, 2022.

2. Attached as **Exhibit 1** is the expert report of Dr. Stephen Ansolabehere. Exhibit 1 sets forth the Arteaga Intervenor-Plaintiffs' proposed remedial congressional plan. The Appendix to Exhibit 1 includes Dr. Ansolabehere's curriculum vitae, supporting data tables, and images of the Proposed Plan.

3. Attached as **Exhibit 2** is a compilation of images of the Benchmark Congressional Plan. These images were produced by the professional staff of the Florida Senate Committee on Reapportionment and are publicly available at: <https://www.flsenate.gov/Session/Redistricting/MapsAndStats>.

4. Attached as **Exhibit 3** is the October 18, 2021 Letter from Senator Rodrigues, Chair of the Senate Committee on Reapportionment, to Senate redistricting staff.

5. Attached as **Exhibit 4** is a meeting packet from January 13, 2022 from the Florida Senate Committee on Reapportionment.<sup>1</sup>

6. Attached as **Exhibit 5** is a compilation of statistical reports on Senate Congressional Plan 8060. These reports were generated by the Florida Legislature's

---

<sup>1</sup> Because the original document was over 600 pages, Intervenor-Plaintiffs have included only the pages relevant to congressional redistricting and excluded pages relevant to the Senate's legislative redistricting. Intervenor-Plaintiffs have not altered this document in any other way.

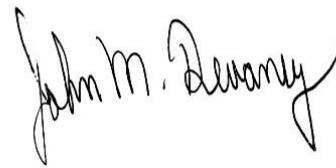
Redistricting Website and are publicly available at:

<https://www.floridaredistricting.gov/pages/submitted-plans>.

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

DATED: April 18, 2022

By: \_\_\_\_\_

A handwritten signature in black ink, reading "John M. Devaney", is written over a horizontal line.

John Devaney

Respectfully submitted,

/s/ Frederick S. Wermuth

Frederick S. Wermuth  
Florida Bar No. 0184111

Thomas A. Zehnder  
Florida Bar No. 0063274

**KING, BLACKWELL, ZEHNDER  
& WERMUTH, P.A.**

P.O. Box 1631  
Orlando, Florida 32802  
Telephone: (407) 422-2472  
Facsimile: (407) 648-0161  
fweremuth@kbzwlaw.com  
tzezhnder@kbzwlaw.com

John M. Devaney\*

**PERKINS COIE LLP**

700 Thirteenth Street N.W., Suite 600  
Washington, D.C. 20005  
Telephone: (202) 654-6200  
Facsimile: (202) 654-6211  
jdevaney@perkinscoie.com

Abha Khanna\*

Jonathan P. Hawley\*

**ELIAS LAW GROUP LLP**

1700 Seventh Avenue, Suite 2100  
Seattle, Washington 98101  
Telephone: (206) 656-0177  
Facsimile: (206) 656-0180  
akhanna@elias.law  
jhawley@elias.law

Christina A. Ford

Florida Bar No. 1011634

Joseph N. Posimato\*

Graham W. White\*

**ELIAS LAW GROUP LLP**

10 G Street NE, Suite 600  
Washington, D.C. 20002  
Phone: (202) 968-4490  
Facsimile: (202) 968-4498  
cford@elias.law  
jposimato@elias.law  
gwhite@elias.law

*Counsel for Plaintiffs*

*\*Admitted Pro hac vice*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 18, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Frederick S. Wermuth

Frederick S. Wermuth  
Florida Bar No. 0184111