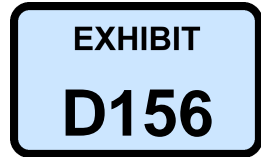




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June 3, 2024

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Re: **Assignment for Expert Report on Florida Redistricting Matter**

Dear Dr. Walker:

Thank you again for agreeing to serve as an expert witness in the above matter. This letter outlines your assignment and the questions that Plaintiffs would like you to analyze and answer in your expert report, and it suggests some data sources for your consideration. If you have questions or concerns, please feel free to contact me or any other member of our team.

## **I. ASSIGNMENT**

Plaintiffs request that you study and answer the following questions in your expert report:

1. Whether, and the extent to which, Hispanic voters voted cohesively in the following jurisdictions:
  - a. Each of the following 11 “benchmark”<sup>1</sup> Florida House Districts (HDs): 103, 105, 110, 111, 112, 113, 114, 115, 116, 118, and 119.
  - b. Each of the following 3 “benchmark” congressional Districts (CDs): 25, 26, and 27.
  - c. Miami-Dade County by itself.
  - d. Miami-Dade County, Monroe County, Collier County, Broward County, and Hendry County (as a group).
  - e. Miami-Dade County, Monroe County, and Collier County (as a group).

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<sup>1</sup> “Benchmark” refers to districts that the Florida legislature identified in 2022 as existing protected Hispanic-majority districts and which the legislature compared to proposed new Hispanic-majority districts at that time.

2. Whether, and the extent to which, the white majority in Florida usually voted sufficiently as a bloc to enable it to defeat the preferred candidates of South Florida's Hispanic/Latino voters.

In answering these questions, you are free to present any supporting analysis that you consider to be helpful or necessary with one exception—Plaintiffs ask that you not base your analysis on any elections that postdate Florida's adoption of its current House and congressional districts on April 22, 2022.

## II. SUGGESTED DATA SOURCES

You may find the following data sources useful as you undertake your analysis. Subject to the exception just mentioned, you are free to analyze any additional data that the following sources omit. For whichever data sources you select, please explain in your report how and why you selected them for analysis.

1. *District shapefiles and block assignment files ("BAFs")*. We are providing to you the following shapefiles and BAFs, which we sourced from Florida's official redistricting website (<https://www.floridaredistricting.gov/>).
  - a. Florida's benchmark House plan (in use 2012–22).
  - b. Florida's benchmark congressional plan (in use from 2016–2020) and its predecessor plan (in use from 2012–2014).
  - c. The House plan that Florida adopted in 2022 (Plan 8013).
  - d. The congressional plan that Florida adopted in 2022 (Plan 109).
2. *Elections data*. The Florida Legislature's redistricting software maintains election data for all statewide elections from 2012–2020. You can access those data at <https://www.floridaredistricting.gov/pages/resources> (there is a link for redistricting data at the bottom of the page). If you choose to analyze data for an election, please remember to explain in your report how and why you decided to select it.
3. *Demographic data on voter registration*. The Florida Legislature's software (link above) maintains voter-registration data by election, and along a variety of demographic dimensions. In addition, the Office of the Miami-Dade County Supervisor of Elections also maintains monthly records of voter-registration data that include demographic information (<https://www.miamidade.gov/elections/voter-statistics-current-archive.html>), with precinct-level data denoted by the "P" links for each available month. Using the Miami-Dade County data, one can match a relevant month's precinct registration report with the month of any particular election.
4. *Voter turnout data*. The Florida Legislature's redistricting software (link above) maintains demographic data on voter turnout. Florida's Division of Elections maintains historical



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voter history files for any years that do not appear in the redistricting software, we would be happy to assist you in accessing any of the files should you choose to study them.

We look forward to working with you, and please reach out with any questions or concerns.

Sincerely,

*/s/ Brian P. Quinn*

Brian P. Quinn  
Counsel  
for O'MELVENY & MYERS LLP