

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

THE LEAGUE OF WOMEN VOTERS OF FLORIDA;
COMMON CAUSE; JOAN ERWIN; ROLAND
SANCHEZ-MEDINA, JR.; J. STEELE OLMSTEAD
CHARLES PETERS; OLIVER D. FINNIGAN;
SERENA CATHERINA BALDACCHINO; AND
DUDLEY BATES,

CASE No.: 2012-CA-2842

PLAINTIFFS,

v.

KENNETH W. DETZNER, in his official
capacity as Florida Secretary of State; THE
FLORIDA SENATE; ANDY GARDINER,
in his official capacity as President of the
Florida State Senate; THE FLORIDA HOUSE OF
REPRESENTATIVES; and STEVE CRISAFULLI, in
his official capacity as Speaker of the Florida
House of Representatives,

DEFENDANTS.

**PLAINTIFFS' WITHDRAWAL OF CERTAIN PROPOSED ALTERNATIVE
REMEDIAL PLANS (CPS-2a and CPS-2b) AND NOTICE OF FILING
AND SERVICE (.doj) OF CORRECTED PROPOSED ALTERNATIVE
REMEDIAL SENATE PLAN (CPS-3b corrected)**

The League of Women Voters of Florida, Common Cause, Joan Erwin, Roland Sanchez-Medina, Jr., J. Steele Olmstead, Charles Peters, Oliver D. Finnigan, Serena Catherina Baldacchino, and Dudley Bates (collectively "Plaintiffs"), hereby withdraw CPS-2a and CPS-2b as proposed remedial plans, give notice of the filing and service (in native .doj format) of a corrected Alternative Remedial Senate Plan "CPS-3b corrected," and state the following bases therefor:

During the special session, members of the Senate and the public requested that the Legislature avoid crossing Tampa Bay in the remedial senate districts. In response to this

commentary, Plaintiffs prepared and submitted Alternative Remedial Senate Plans CPS-2a and CPS-2b, which contained a configuration of District 19 that was wholly within Hillsborough County and did not cross Tampa Bay. However, although there is a likelihood that the Hillsborough-only district would retain African Americans' ability to elect candidates of choice, Plaintiffs will rely only on their alternative version of District 19 that crosses Tampa Bay in CPS-3a, CPS-3b, CPS-4a, and CPS-4b, in order to narrow the issues for trial and ensure that African Americans retain their ability to elect candidates of choice. Accordingly, Plaintiffs withdraw CPS-2a and CPS-2b.

In addition, Plaintiffs submit a corrected Alternative Remedial Senate Plan **CPS-3b corrected**. CPS-3b corrected is the same as the version disclosed to the Legislative Defendants on November 18, 2015, except that Districts 1 and 2 have been replaced to exactly match the versions of Districts 1 and 2 in the other Alternative Remedial Senate Plans (CPS-2a, CPS-2b, CPS-3a, CPS-4a, and CPS-4b) that Plaintiffs disclosed on November 18, 2015 to the Legislative Defendants. Plaintiffs' November 18, 2015 disclosure regarding the Plaintiffs' Alternative Remedial Plans remains accurate in its description of the individuals involved in drawing, reviewing, directing, or approving the Alternative Senate Remedial Plans, including the districts that comprise CPS-3b corrected.

Dated: November 23, 2015

Respectfully Submitted,

/s/David B. King

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 23, 2015 I filed the foregoing using the State of Florida ePortal Filing System, which will serve a copy by email on all counsel listed on the Service List below.

/s/ David B. King
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Counsel for Plaintiffs